



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## Title V Operating Permit

Permit No.: 155-97-TV (R2)

Plant ID: 0870

Effective Date: 2/28/2010

Expiration Date: 2/28/2015

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Ge Appliances & Lighting  
Appliance Park  
Louisville, KY 40225

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than six (6) months prior to the expiration date.

Application No. 09216


Application Received: 4/21/1997  
See Title V Revisions Table

Permit Writer: Shannon Hosey

Administratively Complete: 6/21/1997

Public Notice Date: 9/7/2009

Proposed Permit Date: 11/25/2009

  
Air Pollution Control Officer  
September 17, 2013

**Table of Contents**

Title V Permit Revisions/Changes .....	6
Title V Revision Applications .....	7
Abbreviations and Acronyms .....	9
Preamble .....	10
General Conditions .....	11
Plantwide Limits .....	19
Plantwide Applicable Regulations .....	19
Plantwide Specific Conditions .....	19
Plantwide Comments .....	20
Emission Unit U01: Powder Paint Bake Oven (AP1) .....	21
U01 Applicable Regulations .....	21
U01 Emission Points .....	22
U01 Specific Conditions .....	23
U01 Comments .....	27
Emission Unit U04: E-Coat Prime (AP2) .....	29
U04 Applicable Regulations .....	29
U04 Emission Points .....	30
U04 Specific Conditions .....	31
U04 Comments .....	33
Emission Unit U30: Powder Paint Ovens (AP2) .....	34
U30 Applicable Regulations .....	34
U30 Emission Points .....	35
U30 Specific Conditions .....	36
U30 Comments .....	41
Emission Unit U200: High Efficiency Water Heater Line Powder Coating Operations (AP2) ...	42
U200 Applicable Regulations .....	42
U200 Emission Points .....	43
U200 Specific Conditions .....	44
U200 Comments .....	48
Emission Unit U210: High Efficiency Water Heater Line Touch-Up Paint and Adhesives (AP2)	
.....	49
U210 Applicable Regulations .....	49
U210 Emission Points .....	49
U210 Specific Conditions .....	50
U210 Comments .....	51
Emission Unit U220: High Efficiency Water Heater Line Natural Gas Furnace (AP2) .....	53
U220 Applicable Regulations .....	53
U220 Emission Points .....	53
U220 Specific Conditions .....	54
U220 Comments .....	56

Emission Unit U230: Grit Blast and Enamel Booths (AP2).....	58
U230 Applicable Regulations .....	58
U230 Emission Points.....	58
U230 Specific Conditions .....	59
U230 Comments .....	63
Emission Unit U40: Rack Prime Dip (AP3) .....	64
U40 Applicable Regulations .....	64
U40 Emission Points.....	64
U40 Specific Conditions .....	65
U40 Comments .....	69
Emission Unit U42: Fluid Bed Rack Coater (AP3) (Powder Coating) .....	71
U42 Applicable Regulations .....	71
U42 Emission Points.....	71
U42 Specific Conditions .....	72
U42 Comments .....	78
Emission Unit U311: Adhesive for End Caps on Dishwasher Racks (AP3) .....	80
U311 Applicable Regulations .....	80
U311 Emission Points.....	80
U311 Specific Conditions .....	81
U311 Comments .....	82
Emission Unit U310: Nylon Rack Fluidized Bed Coating (AP3) .....	84
U310 Applicable Regulations .....	84
U310 Emission Points.....	85
U310 Specific Conditions .....	86
U310 Comments .....	90
Emission Units U81 and U82: Gas-fired Boiler 6 and Boiler 8 (AP20).....	92
U81 and U82 Applicable Regulations .....	92
U81 and U82 Emission Points .....	93
U81 and U82 Specific Conditions .....	94
U81 and U82 Comments.....	97
Emission Unit U87: Gasoline Storage Tanks .....	99
U87 Applicable Regulations .....	99
U87 Emission Points.....	99
U87 Specific Conditions .....	100
U87 Comment.....	102
Emission Unit U89: VOC Storage Tank installed before September 1, 1976.....	103
U89 Applicable Regulations .....	103
U89 Emission Points.....	103
U89 Specific Conditions .....	104
U89 Comment.....	105
Emission Units U100: ABS Extruder (AP5) .....	106
U100 Applicable Regulations .....	106
U100 Emission Point .....	106
U100 Specific Conditions .....	107

U100 Comments .....	108
Emission Units U500: Touch-Up Paint, Adhesives and Lubricating the Spine Fin Evaporator	
Bottom Mount Freezer Refrigerator Line (AP5) .....	109
U500 Applicable Regulations .....	109
U500 Emission Points .....	109
U500 Specific Conditions .....	110
U500 Comments .....	112
Emission Units U510: Bottom Mount Freezer Refrigerator Line (AP5) .....	114
U510 Applicable Regulations .....	114
U510 Emission Points .....	115
U510 Specific Conditions .....	116
U510 Comments .....	118
Emission Units U104 - U107: Steel Parts Fabrication (AP2) .....	120
U104 - U107 Applicable Regulations .....	120
U104 - U107 Emission Points .....	120
U104 - U107 Specific Conditions .....	121
U104 - U107 Comments .....	122
Emission Unit U108: Stainless Steel Dishwasher Tub Line (AP2) .....	123
U108 Applicable Regulations .....	123
U108 Emission Points .....	124
U108 Specific Conditions .....	125
U108 Comments .....	127
Emission Unit U109: Abrasive Blasting (Hanger Paint Stripping Process (AP2)) .....	128
U109 Applicable Regulations .....	128
U109 Emission Points .....	128
U109 Specific Conditions .....	129
U109 Comments .....	132
Emission Unit U111: Emergency Generators .....	133
U111 Applicable Regulations .....	133
U111 Emission Points .....	133
U111 Specific Conditions .....	134
U111 Comments .....	136
Emission Unit: Solvent Metal Cleaning Equipment .....	138
Applicable Regulations .....	138
Solvent Metal Cleaning Equipment Emission Points .....	138
Specific Conditions .....	139
Emission Unit: Combustion Sources less than 10 MMBtu per hour .....	143
Applicable Regulations .....	143
Combustion Sources less than 10 MMBtu per hour Emission Points .....	143
Specific Conditions .....	146
Comments .....	149
Emission Unit: Miscellaneous .....	150
Applicable Regulations .....	150

Miscellaneous Equipment Emission Points .....	150
Specific Conditions .....	152
Comments .....	157
Permit Shield.....	158
Off Permit Documents .....	158
Alternative Operating Scenario.....	158
Insignificant Activities.....	159
Appendix A.....	168
NOx RACT Plan - Amendment 1 .....	168
Comment.....	172
Appendix B .....	173
40 CFR 63 Subpart NNNN (MACT) Specific Conditions .....	173
Comments .....	182
Appendix C - Protocol Checklist for Performance Test .....	183
End of Document .....	184

**Title V Permit Revisions/Changes**

<b>Revision No.</b>	<b>Date of Issuance</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Emission Unit/Page No.</b>	<b>Description</b>
Initial	01/22/2010	9/7/2009	Initial	Entire permit	Initial issuance of the permit
R1	01/22/2010	NA	Administrative	U01, U04, U30, U42, Combustion Sources <10 MMBtu/hr, and Miscellaneous	Incorporate construction permits # 72-89-C(R1), 73-89-C(R1), 19-91-C (R1), 145-98-C(R1), 201-01-C(R1), 216-93-C(R1), 405-92-C(R1), 334-92-C, 22-91-C(R1), 494-08-C (R1), 129-09-C (R1), and 652-08-C (R1)

Revision No.	Date of Issuance	Public Notice Date	Type	Emission Unit/Page No.	Description
R2	09/17/2013	NA	Administrative	U01, U200 AP2, U210 AP2, U220 AP2, U230 AP2, U311 AP3, U310 AP3, U500 AP5, U510 AP5, Combustion Sources <10 MMBtu/hr and Insignificant Activities	<p>Incorporate construction permits # 207-09-C(R1), 34677-12-C, 33733-11-C, 33371-11-C, 33029-11-C, 33262-11-C, 33667-11-C, 36340-12-C, 29161-10-C(R3), 33022-11-C, 32675-11-C, 33318-11-C, 33671-11-C, 33373-11-C(R1), and 34823-12-C. Updated TAC language and the Insignificant Activities List. Updated Boiler #6 (U81) description to reflect 1998 boiler modification</p> <p>Removed U90 as equipment has been removed</p> <p>Removed U101, U102, and U103 from emission Unit U100 – 103, as equipment has been removed, and renamed emission unit to U100</p> <p>Removed Regulations 7.08 and 7.09 from emission unit U111 as the District has determined these were not applicable regulations for emergency generators</p> <p>Removed emission points 176-00 and 73-87 from emission unit U-Miscellaneous as the equipment has been removed</p>

### Title V Revision Applications

Application #	Date	Type
30211	12/17/2010	TV revision to include equipment from construction permit 207-09-C(R1) two (2) Kohler emergency generators
30627	12/23/2010	TV revision to included updated IA list

<b>Application #</b>	<b>Date</b>	<b>Type</b>
34809	4/10/2012	Request to remove Emission Point 160-93 from the Miscellaneous Emission Unit.
35553	7/10/2012	TV revision to included equipment from construction permits: 34677-12-C, 33733-11-C, 33371-11-C, 33029-11-C, 33262-11-C, 29161-10-C(R3), 33022-11-C, 32675-11-C, 33318-11-C, and 33671-11-C.
36645	12/14/2012	TV revision to include equipment form construction permit: 33667-11-C
36778	1/11/2013	TV revision to included equipment from construction permits: 36340-12-C, 33373-11-C(R1), and 34823-12-C. Additional to include updates to the IA list to add the following equipment: Bradford white 1.99 MM Btu/hr heater Park Athletic Club (appl date 12/17/2010); pellet grinder and cyclone (appl date 3/9/2011); grinding operation for AP-3 ash white tub (appl date 3/28/2011); AP-1 make up air heater (appl date 12/7/2012).



### Abbreviations and Acronyms

AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
ESP	- Electrostatic Precipitator
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
PTE	- Potential to emit
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SC	- Specific Condition
SO <sub>2</sub>	- Sulfur dioxide
TAC	- Toxic Air Contaminant
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," as defined in District Regulation 2.16, section 1.22 which was current as of the date the permit was proposed for review by USEPA, Region 4. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply.

**General Conditions**

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually, or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification (Form 9400-O) directly to the EPA and to the District, as set forth in Regulation 2.16, section 4.3.5.4, at the following addresses:

*US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960*

*Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745*

This certification must be postmarked by 15 April of the year following the year for which the certification is being submitted, or other such due date as required by another applicable regulation.

3. **Compliance Schedule** - The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, they shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency;
  - ii. The permitted facility was at the time being properly operated;
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit; and
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08, section 1.3. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.6)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit.  
(Regulation 2.16, section 4.1.13.6)
- If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA at the address in General Condition 35.b. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall:
- a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
  - b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year.  
(Regulation 2.16, section 4.3.5.3.6)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours: (Regulation 2.16, section 4.3.2)
- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
  - b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1<sup>st</sup> through June 30<sup>th</sup> and July 1<sup>st</sup> through December 31<sup>st</sup> of each calendar year. All reports shall be sent to the District at the address in General Condition

2 and must be postmarked by the 60<sup>th</sup> day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations.

All semi-annual compliance reports shall include the statement Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete and the signature and title of a Responsible Official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through June 30 <sup>th</sup>	August 29 <sup>th</sup>
July 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup> <sup>1</sup>

<sup>1</sup>Note: The date for leap years is February 29<sup>th</sup>.

If a change in the Responsible Official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP 100-A) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, section 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.

21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Termination and Revocation by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1 through 5.11.6. For purposes of section 5.11.1, substantial or unresolved noncompliance includes, but is not limited to:
  - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific

circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected.

(Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
  - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

***Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745***
  - b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at:

***US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104***
36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application



<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i> )
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i> )

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.09	Prohibition of Air Pollution
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants, General Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains,

services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;
- b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
- c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40 CFR 82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

### Plantwide Limits

#### Plantwide Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.05	Prevention of Significant Deterioration of Air Quality	1

### Plantwide Specific Conditions

#### S1. Standards (Regulation 2.16, section 4.1.1)

##### a. VOC

The owner or operator shall not allow plantwide VOC emissions to equal or exceed 250 tons per 12 consecutive months. (Regulation 2.05) (Construction Permit 33318-11-C) (See Comment 1)

##### b. NO<sub>x</sub>

The owner or operator shall not allow plantwide NO<sub>x</sub> emissions to equal or exceed 100 tons per 12 consecutive months. (Regulation 2.05) (Construction Permit 33318-11-C) (See Comment 2)

#### S2. Monitoring And Record Keeping (Regulation 2.16, section 4.1.9.1)

##### a. VOC

The owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions.

##### b. NO<sub>x</sub>

The owner or operator shall monthly calculate and record the monthly and 12 consecutive month NO<sub>x</sub> emissions.

#### S3. Reporting (Regulation 2.16, section. 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

##### *Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- The signature and title of the responsible official of the company.

a. **VOC**

For the 250 tpy plantwide VOC limit:

- Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- The monthly and 12 consecutive month plantwide VOC emissions;
- Reason for excess emissions; and
- Description of corrective action taken to prevent future exceedances.
- A negative declaration if no excess emissions occurred.

b. **NO<sub>x</sub>**

For the 100 tpy plantwide NO<sub>x</sub> limit:

- Identification of all periods of exceedances of the plantwide NO<sub>x</sub> limit including the quantity of excess emissions;
- Reason for excess emissions; and
- Description of corrective action taken to prevent future exceedances.
- A negative declaration if there were no exceedances.

**Plantwide Comments**

- The VOC limit of 250 tons per year, plantwide, is a PSD avoidance limit taken in Construction Permit 33318-11-C.
- The NO<sub>x</sub> limit of 100 tons per year, plantwide, is a PSD and NO<sub>x</sub> RACT avoidance limit taken in Construction Permit 33318-11-C.
- The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
Title V 1st Semiannual	January 1 through June 30	August 29
Title V 2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

**Emission Unit U01: Powder Paint Bake Oven (AP1)****U01 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 6
7.08	Standards of Performance for New Process Operations	1 through 3
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

U01 Emission Points					
ID	Description	Applicable Requirement	Allowable Emission/ Equipment Standard	Control Device	Stack ID
EP 100A	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters. Each booth has 56 spray guns.	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.08	2.34 lb PM/hr Opacity <20%		
		5.00, 5.01; 5.20, 5.21, 5.22, 5.23	See Comment 8		
EP 100B	100 Electric Bake Oven	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.59	See SC.S1.a.		
EP 100C	9-stage phosphator	N/A	N/A	N/A	N/A

**U01 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from equipment subject to Regulation 7.59 **plantwide** to exceed 5 tons during any twelve consecutive month period and 0.42 tons during any calendar month, unless compliant coatings listed in Specific Condition S1.a.ii. are used. (Regulation 7.59 section 5.2) (See Comment 6)

or

- ii. The owner or operator shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the applicable emission rate as follows: (Regulation 7.59, Section 3.1)
  - (a) 0.52 kg of VOC/l (4.3 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for clear coatings, (Regulation 7.59, Section 3.1.1)
  - (b) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for air-dried coatings, (Regulation 7.59, Section 3.1.2)
  - (c) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for extreme performance coatings, or (Regulation 7.59, Section 3.1.3)
  - (d) 0.36 kg of VOC/l (3.0 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for all other coatings.

**b. PM**

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the powder coating operation. (Regulation 7.08, section 3.1.2)
- ii. The owner or operator shall utilize the reclamation system at all times the powder coater is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.16, Section 4.1.1) (See Comment 3)

**c. HAP**

See Appendix B, Specific Condition S1.

**d. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

e. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 7)

S2. **Monitoring (Regulation 2.16, section 4.1.9.1)**

a. **VOC**

See Specific Condition S3.

b. **PM**

The owner or operator shall perform monthly visual inspections of the structural and mechanical integrity of the reclamation system **for signs of damage, air leakage, corrosion, etc. and repair as needed.**

c. **HAP**

See Appendix B, Specific Condition S2.

d. **Opacity**

There are no monitoring requirements for this equipment. (See Comment 8)

e. **TAC**

See Specific Condition S3.e

S3. **Record Keeping (Regulation 2.16, section 4.1.9.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **VOC**

i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)

- (a) The regulation and section number applicable to the affected facility for which the records are being maintained, (See Comment 5)
- (b) The application method and substrate type (metal, plastic, etc.), (See Comment 5)
- (c) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the month.
- (d) The VOC content as applied in each coating and solvent, (See Comment 5)
- (e) The date, or usage record period, for each application of coating and solvent,



- (f) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during each calendar month, and
    - (g) Oven temperature, where applicable.
  - ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
  - iii. The owner or operator shall monthly calculate and record the monthly and twelve consecutive month plantwide VOC emissions subject to Regulation 7.59.
  - iv. The owner or operator shall be allowed to maintain a one time record of the information required in Specific Conditions S3.a.i.1),2),4) and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
- b. **PM**
  - i. The owner or operator shall either:
    - (a) Maintain monthly records of the type and amount of products transferred and maintain records, daily, of the hours of operation. (See Comment 3)
    - or
    - (b) Maintain a record of the daily potential to emit. (See Comment 3)
  - ii. The owner or operator shall keep monthly records of the visual inspection of the structural and mechanical integrity of the reclamation system.
  - iii. The owner or operator shall maintain daily records of any periods of time where the process was operating and the reclamation system was not operating or a declaration that the reclamation system operated at all times that day when the process was operating.
  - iv. If there is any time that the reclamation system is bypassed or not in operation when the powder coat booth is operating, then the owner or operator shall keep a record of the following for each bypass event:
    - (a) Date;
    - (b) Start time and stop time;
    - (c) Identification of the process equipment;
    - (d) PM emissions for each hour during the bypass in lb/hr;
    - (e) Summary of the cause or reason for each bypass event;
    - (f) Corrective action taken to minimize the extent or duration of the bypass event; and

- (g) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

c. **HAP**

See Appendix B, Specific Condition S3.

d. **Opacity**

There are no record keeping requirements for this equipment. (See Comment 8)

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

S4. **Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 4)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- The signature and title of the responsible official of the company.

a. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

- i. Emission Unit ID number;
- ii. Identification of all periods of exceedances of the VOC emission limit including the quantity of excess emissions;
- iii. The combined monthly and 12 consecutive month plantwide VOC emissions;
- iv. If the 5 tpy plantwide VOC limit is exceeded, the VOC lb/gal as applied;

- v. Reason for excess emissions whether process upset, other known causes, or unknown causes; and
  - vi. Description of any corrective action taken.
  - vii. A negative declaration if no deviations or excess emissions occurred.
- b. **PM**

The owner or operator shall report the following information regarding PM By-Pass Activity in the semi-annual reports.

  - i. Number of times the PM vent stream by-passes the reclamation system and is vented to the atmosphere;
  - ii. Duration of each by-pass to the atmosphere; and
  - iii. Calculated quantity of tons of PM emitted for each by-pass.
  - iv. A negative declaration if no by-passes of the reclamation system occur.
- c. **HAP**

See Appendix B, Specific Condition S4.
- d. **Opacity**

There are no reporting requirements for this equipment. (See Comment 8)
- e. **TAC**
  - i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
  - ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
  - iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

#### **U01 Comments**

1. Powder paints are exempt from 40 CFR 60 Subpart SS.
2. The potential VOC emissions for this construction project (34677-12-C) were 17.56 tpy VOC based on 3,511,008 lb/yr of powder coating usage. The original construction permit (216-93-C(R1)) contained a less than 9 tpy VOC limit and the company requested to remove that limit since the company has accepted a plantwide limit of less than 250 tpy to avoid PSD applicability.

3. A one time compliance demonstration has been performed for PM on April 23, 2007 and the standard cannot be exceeded when the reclamation system is in operation. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.
4. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
Title V 1st Semiannual	January 1 through June 30	August 29
Title V 2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

40 CFR 63 Subpart NNNN 1<sup>st</sup> Semi-annual January 1 through June 30 July 31

40 CFR 63 Subpart NNNN 2<sup>nd</sup> Semi-annual July 1 through December 31 January 31

All semi-annual reports can be reported together except for the reports required by 40CFR63 Subpart NNNN unless both compliance deadlines can be achieved.

5. The regulation applicable will be Regulation 7.59, application method will be electrostatic application of powder paint, and the substrate type will be metal. The owner or operator shall be allowed to maintain a one time record of the information and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
6. This 5 tpy limit to avoid the standards in Regulation 7.59, section 3.1 will be allowed if any of their coatings can exceed the standards.
7. The MSDS for the powder paints used show that they contain no TACs.
8. The District has determined that no periodic visible emissions surveys are required for this emission unit.

**Emission Unit U04: E-Coat Prime (AP2)****U04 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 60 Subpart A	General Provisions	60.1 through 60.19
40 CFR 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances	60.450 through 60.456
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.02	Adoption of Federal New Source Performance Standards	1, 2, 3.55, 4, 5
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U04 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 210A	Dip Tank	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		
EP 210B	Post-Rinse Spray	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		
EP 206	Dehydrator	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		
EP 207	Bake Oven	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		
EP 208	Cooling/Drip Tunnel	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		
EP 209	Cooling/Drip Tunnel	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		40 CFR 60 Subpart SS	0.90 kg VOCs/liter applied coating solids		

**U04 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not discharge VOC emissions that exceed 0.90 kilogram of VOC's per liter of applied coating solids from any surface coating operation on a large appliance surface coating line. (40 CFR 60.452 Subpart SS) (See Comment 1)
- ii. The owner or operator shall limit the combined VOC emissions from emission points (EP210A and EP210B) to less than or equal to 58.3 tons per 12 consecutive month period. (Regulation 2.12) (Construction Permit 405-92-C (R1))

**b. HAP**

See Appendix B, Specific Condition S1.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

See Specific Condition S3.a.

**b. HAP**

See Appendix B, Specific Condition S2.

**c. TAC**

See Specific Condition S3.c.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

The owner or operator shall maintain at the source records and calculations used to determine the kg of VOC/liter of applied solids for each coating used.

**b. HAP**

See Appendix B, Specific Condition S3.

**c. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 2)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- The signature and title of the responsible official of the company.

**a. VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

- i. Emission Unit ID number;
- ii. Identification of all periods of exceedances of the VOC emission limit including the quantity of excess emissions;
- iii. Reason for excess emissions whether process upset, other known causes, or unknown causes;
- iv. Description of any corrective action taken; and
- v. A negative declaration if no deviations or excess emissions occurred for the electric bake oven.

**b. HAP**

See Appendix B, Specific Condition S4.

**c. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-



analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

#### **U04 Comments**

1. The potential VOC emissions for this project (U04) were 20.75 tpy, which was below the significant level of 40 tpy for PSD/Nonattainment NSR.
2. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

40 CFR 63 Subpart NNNN 1<sup>st</sup> Semi-annual January 1 through June 30 July 31st

40 CFR 63 Subpart NNNN 2<sup>nd</sup> Semi-annual July 1 through December 31 January 31st

All semi-annual reports can be reported together except for the reports required by 40CFR63 Subpart NNNN unless both compliance deadlines can be achieved.

**Emission Unit U30: Powder Paint Ovens (AP2)****U30 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 6
7.08	Standards of Performance for New Process Operations	1 through 3
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U30 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 213	Paint Curing Oven #1 for Black, natural gas- fired	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.59	See SC.S1.a.		
EP 214	Paint Curing Oven #2 for Colors, natural gas- fired	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.59	See SC.S1.a.		
EP 214B	Double tunnel phosphator	N/A	N/A	N/A	N/A
EP 214C	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters.	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.08	2.34 lb PM/hr		
			Opacity < 20%		

**U30 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from equipment subject to Regulation 7.59 **plantwide** to exceed 5 tons during any twelve consecutive month period and 0.42 tons during any calendar month, unless compliant coatings listed in Specific Condition S1.a.ii. are used. (Regulation 7.59 section 5.2)
- or
- ii. The owner or operator shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the applicable emission rate as follows: (Regulation 7.59, Section 3.1)
  - (a) 0.52 kg of VOC/l (4.3 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for clear coatings, (Regulation 7.59, Section 3.1.1)
  - (b) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for air-dried coatings, (Regulation 7.59, Section 3.1.2)
  - (c) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for extreme performance coatings, or (Regulation 7.59, Section 3.1.3)
  - (d) 0.36 kg of VOC/l (3.0 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for all other coatings.
- iii. The owner or operator shall limit the combined VOC emissions from emission points (EP213, EP214, EP214B, and EP214C) to less than or equal to 18.0 tons per 12 consecutive month period. (Regulation 2.12) (Construction Permit 334-92-C)

**b. HAP**

See Appendix B, Specific Condition S1.

**c. PM**

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the powder coating operation. (Regulation 7.08, section 3.1.1)
- ii. The owner or operator shall utilize the reclamation unit at all times the powder coater is in operation and shall, to the extent practicable and minimize emissions. (Regulation 2.16, Section 4.1.1) (See Comment 4)

**d. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

e. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. **Monitoring (Regulation 2.16, section 4.1.9.1)**

a. **VOC**

See Specific Condition S3.a.

b. **HAP**

See Appendix B, Specific Condition S2.

c. **PM**

The owner or operator shall perform monthly visual inspections of the structural and mechanical integrity of the reclamation unit for signs of damage, air leakage, corrosion, etc. and repair as needed.

d. **Opacity**

For the electrostatic powder paint system (EP 214c), the owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys should be performed on the exhaust ports for the equipment. If that is not practical, then the room exhaust vents or exterior doors may be utilized.

At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation. (See Comment 7)

e. **TAC**

See Specific Condition S3.e.

S3. **Record Keeping (Regulation 2.16, section 4.1.9.2)**

a. **VOC**

i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)

- (a) The regulation and section number applicable to the affected facility for which the records are being maintained, (See Comment 5)

- (b) The application method and substrate type (metal, plastic, etc.), (See Comment 5)
    - (c) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during each calendar month.
    - (d) The VOC content as applied in each coating and solvent, (See Comment 5)
    - (e) The date, or usage record period, for each application of coating and solvent,
    - (f) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the calendar month.
    - (g) Oven temperature, where applicable.
  - ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
  - iii. The owner or operator shall monthly calculate and record the monthly and twelve consecutive month plantwide VOC emissions subject to Regulation 7.59.
  - iv. Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.
  - v. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions from emission points (EP213, EP214, EP214B, and EP214C).
- b. **HAP**
- See Appendix B, Specific Condition S3.
- c. **PM**
- i. The owner or operator shall either:
    - (a) Maintain monthly records of the type and amount of products transferred and maintain records, daily, of the hours of operation. (See Comment 4)
    - or
    - (b) Maintain a record of the daily potential to emit. (See Comment 4)
  - ii. The owner or operator shall maintain daily records of any periods of time where the process was operating and the reclamation unit was not operating or a declaration that the reclamation unit operated at all times that day when the process was operating.
  - iii. If there is any time that the reclamation unit is bypassed or not in

operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:

- (a) Date;
- (b) Start time and stop time;
- (c) Identification of the process equipment;
- (d) PM emissions for each hour during the bypass in lb/hr;
- (e) Summary of the cause or reason for each bypass event;
- (f) Corrective action taken to minimize the extent or duration of the bypass event; and
- (g) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

d. **Opacity**

The owner or operator shall maintain monthly records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases

S4. **Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- The signature and title of the responsible official of the company

a. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

- i. Emission Unit ID number;
- ii. Identification of all periods of exceedances of the VOC emission limit including the quantity of excess emissions;
- iii. The combined monthly and 12 consecutive month VOC emissions from emission points (EP213, EP214, EP214B, and EP214C);
- iv. If the 5 tpy plantwide VOC limit is exceeded, the VOC lb/gal as applied;
- v. Reason for excess emissions whether process upset, other known causes, or unknown causes; and
- vi. Description of any corrective action taken.
- vii. A negative declaration if no deviations or excess emissions occurred.

b. **HAP**

See Appendix B, Specific Condition S4.

c. **PM**

The owner or operator shall report the following information regarding PM By-Pass Activity in the semi-annual reports.

- i. Number of times the PM vent stream by-passes the control device and is vented to the atmosphere;
- ii. Duration of each by-pass to the atmosphere; and
- iii. Calculated quantity of tons of PM emitted for each by-pass.
- iv. A negative declaration if no by-passes occur.

d. **Opacity**

- i. The date, time and results of each Method 9 that exceeded the opacity standard.
- ii. The number of surveys where visible emissions were observed.
- iii. Description of each corrective action taken.
- iv. A negative declaration if no visible emissions are observed.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not



limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

### U30 Comments

1. Powder paints are exempt from 40 CFR 60 Subpart SS.
2. The potential VOC emissions for this project (U30) were 28.9 tpy which was below the significant level of 40 tpy for PSD/Nonattainment NSR.
3. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
Title V 1st Semiannual	January 1 through June 30	August 29
Title V 2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

40 CFR 63 Subpart NNNN 1<sup>st</sup> Semi-annual January 1 through June 30 July 31

40 CFR 63 Subpart NNNN 2<sup>nd</sup> Semi-annual July 1 through December 31 January 31

All semi-annual reports can be reported together except for the reports required by 40CFR63 Subpart NNNN unless both compliance deadlines can be achieved.

4. A one-time compliance demonstration has been performed for PM on April 23, 2007 and the standard cannot be exceeded when the reclamation system is in operation. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.
5. The regulation applicable will be Regulation 7.59, application method will be electrostatic application of powder paint, and the substrate type will be metal. The owner or operator shall be allowed to maintain a one time record of the information and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
6. This 5 tpy limit to avoid the standards in Regulation 7.59, section 3.1 will be allowed if any of their coatings can exceed the standards.
7. The District has determined that no periodic visible emissions surveys are required for this emission unit.

**Emission Unit U200: High Efficiency Water Heater Line Powder Coating Operations  
(AP2)**

**U200 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 6
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standards of Performance for New Source Using Volatile Organic Compounds	1 through 4

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

U200 Emission Points					
ID	Description	Applicable Requirement	Allowable Emission/ Equipment Standard	Control Device	Stack ID
AP2-200	Pretreatment/Cleaning Dry-Off Oven (Electric)	7.08	2.34 lb PM/hr	N/A	S200
			Opacity < 20%		
		7.25	See SC.S1.a.i.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 5		
AP2-201	Powder Paint Cure Oven (Infrared)	7.08	2.34 lb PM/hr	N/A	S201
			Opacity < 20%		
		7.59	See SC.S1.a.ii.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 5		
AP2-202	Electrostatic Application of Powder Paint consisting of two (2) powder coating operations each equipped with a reclamation system consisting of a cyclone and dust collector with twelve filters.	7.08	2.34 lb PM/hr	N/A	N/A
			Opacity < 20%		
		7.59	See SC.S1.a.ii.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 5		

**U200 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC****i. Pretreatment Cleaner:**

- i. The owner or operator shall not allow or cause the VOC emissions from the use pretreatment cleaner to exceed 15.29 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Construction Permit 33733-11-C, effective date 12/6/2011)(See Comment 1)
- ii. The owner or operator shall contain the cleaner within closed reservoirs to reduce evaporation loss. (Regulation 7.25, section 3) (BACT) (Construction Permit 33733-11-C, effective date 12/6/2011) (See Comment 1)
- iii. The owner or operator shall reduce the amount of cleaner remaining on the metal parts prior to the IR oven by operating an air blow-off chamber. (Regulation 7.25, section 3) (BACT) (Construction Permit 33733-11-C, effective date 12/6/2011) (See Comment 1)
- iv. The owner or operator shall recover and reuse cleaner by using specially designed paint racks and drip chambers. (Regulation 7.25, section 3) (BACT) (Construction Permit 33733-11-C, effective date 12/6/2011) (See Comment 1)

**ii. Powder Coating Ovens:**

- i. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from equipment subject to Regulation 7.59 **plantwide** to exceed 5 tons during any 12 consecutive month period unless compliant coatings listed in Specific Condition S1.a.ii.2) are used. (Regulation 7.59, section 5.2)

Or

- ii. The owner or operator shall not allow or cause the emissions of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the applicable emission rate as follows: (Regulation 7.59, section 3.1)
  - (a) 0.52 kg of VOC/l (4.3 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for clear coatings, (Regulation 7.59, section 3.1.1)
  - (b) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for air-dried coatings, (Regulation 7.59, section 3.1.2)

- (c) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for extreme performance coatings, or (Regulation 7.59, section 3.1.3)
- (d) 0.36 kg of VOC/l (3.0 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for all other coatings. (Regulation 7.59, section 3.1.4)

b. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for each powder coating booth. (Regulation 7.08, section 3.1.2) (See Comment 2)

c. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

d. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 4)

S2. **Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)**

a. **VOC**

i. Pretreatment Cleaner:

- (a) The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance with the 15.29 tpy limit in Specific Condition S1.a.i.1).
- (b) The owner or operator shall, monthly, record the amount of cleaner used.

ii. Powder Coating Ovens:

- (a) An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)
  - (i) (The regulation and section number applicable to the affected facility for which the records are being maintained,
  - (ii) (The application method and substrate type (metal, plastic, etc.),
  - (iii) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the averaging period. The District may specifically authorize the usage record to reflect a period

longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month,

- (iv) The VOC content as applied in each coating and solvent,
- (v) The date, or usage record period, for each application of coating and solvent,
- (vi) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month.
- (vii) Oven temperature, monthly, where applicable.
- (b) The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
- (c) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- (d) The owner or operator shall be allowed to maintain a one-time record of the information required in Specific Conditions S2.a.ii.(a) ((i, ii, iv)) and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
- (e) The owner or operator shall, monthly, calculate the monthly and 12 consecutive month plantwide VOC emissions.

b. **PM**

There are no monitoring or record keeping requirements for this equipment. (See Comment 2)

c. **Opacity**

There are no monitoring or record keeping requirements for this equipment. (See Comment 5)

d. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis

of emissions, and/or modeling results.

- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S3. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- The signature and title of the responsible official of the company

**a. VOC**

**i. Pretreatment Cleaner:**

- (a) Identification of all periods of exceedances of the 15.29 tpy VOC limit including the quantity of excess emissions;
- (b) Reason for excess emissions; and
- (c) Description of corrective action taken to prevent future exceedances.
- (d) A negative declaration if there were no exceedances.

**ii. Powder Coating Oven:**

If compliant coatings aren't used:

- (a) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- (b) The monthly and 12 consecutive month VOC emissions;
- (c) Reason for excess emissions;
- (d) Description of corrective action taken to prevent future exceedances; and
- (e) If the 5 tpy plantwide VOC limit is exceeded, the VOC lb/gal as applied.

(f) A negative declaration if no excess emissions occurred.

b. **PM**

There are no compliance reporting requirements for this equipment.

c. **Opacity**

There are no compliance reporting requirements for this equipment.

d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

### U200 Comments

1. The VOC limit of 15.29 tons per year is based upon a BACT for Regulation 7.25. The potential for the pretreatment cleaning is 24.55 tpy VOC. If the company wishes to increase the VOC limit for this process either a new BACT must be submitted or the entire VOC limit must be taken from the bank. The company originally submitted the BACT on October 14, 2011 and the District requested the company revise the requested VOC limit. The company then submitted a revised BACT on October 24, 2011 and the District approved the revised BACT on that same day. The good management practices are included in the BACT.
2. A one-time PM compliance demonstration for this equipment was performed on 10/7/2011 and the lb/hr standard cannot be exceeded uncontrolled.
3. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semi-annual Report	January 1 through June 30	August 29
2nd Semi-annual Report	July 1 through December 31	March 11

Notes: <sup>1</sup>The date for leap years is February 29.

4. The powder coating material contains no TACs.
5. The District has determined that no periodic visible emissions surveys are required for this emission unit.



**Emission Unit U210: High Efficiency Water Heater Line Touch-Up Paint and Adhesives (AP2)****U210 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standards of Performance for New Source Using Volatile Organic Compounds	1 through 4
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U210 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
AP2-210	HEWH Touch-Up Paints and Adhesives	7.25	See SC.S1.a.	N/A	N/A
		40 CFR 63 Subpart NNNN	See Appendix B, SC S1.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 2		

**U210 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall not allow or cause the VOC emissions from equipment subject to Regulation 7.25, for emissions that do not have a BACT limit, to not equal or exceed five (5) tons, plantwide, during any consecutive 12-month period. (Regulation 7.25, section 5.1) (See Comment 1)

**b. HAP**

See Appendix B, Specific Condition S1.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 2)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. VOC**

The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions.

**b. HAPs**

See Appendix B, Specific Condition S2 and S3.

**c. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit a semi-annual compliance report that includes the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

Responsible Official Certification

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete."
- The signature and title of the responsible official of the company.

a. **VOC**

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions in tons;
- ii. Reason for excess emissions; and
- iii. Description of corrective action taken to prevent future exceedances.
- iv. A negative declaration if there were no exceedances.

b. **HAP**

See Appendix B, Specific Condition S4.

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

**U210 Comments**

1. Equipment subject to the plantwide 5 ton per year VOC emission limit in Regulation 7.25 are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-C(R1), Bottom Mount Freezer Refrigerator touch-up painting, High Efficiency Hot Water Heater touch-up painting and Insignificant Activities.
2. The potential uncontrolled TAC emissions are found to be de minimis.
3. The semi-annual compliance reports are due on or before the following date of each calendar year:

Report Description

Report Period

Report Due Dates

1 <sup>st</sup> Semi-annual Report	January 1 through June 30	August 29
2 <sup>nd</sup> Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

4. This process was previously permitted in construction permit 33371-11-C.

**Emission Unit U220: High Efficiency Water Heater Line Natural Gas Furnace (AP2)****U220 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3
7.09	Standards of Performance for New Process Gas Streams	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U220 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
AP2-220	One (1) Natural Gas Fired Enameling Furnace rated at 3.1 MMBtu/hr	7.09	See SC.S1.(b&c).	N/A	S220
		7.08	See SC.S1.a.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 4		

**U220 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. NO<sub>x</sub>**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO<sub>x</sub> fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>. (Regulation 7.08, section 4) (See Comment 1)

**b. CO**

The owner or operator of a facility shall not emit carbon monoxide gases from a process unless they are burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level. (Regulation 7.09, section 5.1) (See Comment 2)

**c. SO<sub>2</sub>**

The owner or operator shall not allow the affected facility emissions of the pollutant SO<sub>2</sub> to equal or exceed 40 tons during any twelve consecutive month period. (Regulation 7.09, section 4) (See Comment 3)

Or

The owner or operator shall not cause or allow at an the affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen. (Regulation 7.09, section 4)

**d. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 4)

**e. PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2)

**f. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. NO<sub>x</sub>**

There are no monitoring or record keeping requirements for this equipment. (See Comment 1)

b. **CO**

There are no monitoring or record keeping requirements for this equipment. (See Comment 2)

c. **SO<sub>2</sub>**

There are no monitoring or record keeping requirements for SO<sub>2</sub> compliance for meeting the 40 tons during any twelve consecutive months. (See Comment 3)

Or

The owner or operator shall keep a record of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

d. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

e. **PM**

There are no monitoring or record keeping requirements for this equipment. (See Comment 7)

f. **Opacity**

There are no monitoring or record keeping requirements for this equipment. (See Comment 8)

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit a semi-annual compliance report that includes the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 6)

**Responsible Official Certification**

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete."

- The signature and title of the responsible official of the company.
- a. **NO<sub>x</sub>**  
There are no compliance reporting requirements for this equipment.
- b. **CO**  
There are no compliance reporting requirements for this equipment.
- c. **SO<sub>2</sub>**  
There are no compliance reporting requirements for this equipment for meeting the 40 tons during any twelve consecutive months.  
  
Or  
  
The owner or operator shall submit a one-time report of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.
- d. **TAC**
  - i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
  - ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
  - iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.
- e. **PM**  
There are no PM compliance reporting requirements for this equipment. (See Comment 7)
- f. **Opacity**  
There are no Opacity compliance reporting requirements for this equipment. (See Comment 8)

#### U220 Comments

1. A one-time NO<sub>x</sub> compliance demonstration has been performed using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.



2. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1.
3. A one-time SO<sub>2</sub> compliance demonstration has been performed using AP-42 emission factors and combusting natural gas, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.
4. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)
5. The emissions from this equipment do not exceed the significant levels for PSD, however, since the furnace is part of the High Efficiency Hot Water Heater Line, the total line emissions did not exceed the significant levels for PSD.
6. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1 <sup>st</sup> Semi-annual Report	January 1 through June 30	August 29
2 <sup>nd</sup> Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

7. A one-time compliance demonstration has been performed and the lb/hr PM emission standard can not be exceeded uncontrolled.
8. The District has determined that no periodic visible emissions surveys are required for this emission unit.
9. This process was previously permitted in construction permit 33029-11-C.

**Emission Unit U230: Grit Blast and Enamel Booths (AP2)****U230 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U230 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
AP2-231	Tank Shell Dry Grit Blasting 3969 lb/hr with a process baghouse	7.08	2.34 lb PM/hr Opacity <20%	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Specific Condition S1.c.		
AP2-232	Tank Bottom Dry Grit Blasting 2775 lb/hr with a process baghouse	7.08	2.34 lb PM/hr Opacity <20%	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Specific Condition S1.c.		
AP2-233	Tank Shell Enamel Booth 413 lb/hr with a process baghouse	7.08	2.34 lb PM/hr Opacity < 20%	C 233 HEPA Filters	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Specific Condition S1.c.		
AP2-234	Tank Bottom Enamel Booth 141 lb/hr with a process baghouse	7.08	2.34 lb PM/hr Opacity < 20%	C 234 HEPA Filters	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Specific Condition S1.c.		

**U230 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. PM**

- i. The owner or operator shall not allow PM emissions to exceed 5.49 lb/hr for the 3969 lb/hr grit blasting booth. (Regulation 7.08, section 3.1.2)
- ii. The owner or operator shall not allow PM emissions to exceed 4.40 lb/hr for the 2775 lb/hr grit blasting booth. (Regulation 7.08, section 3.1.2)
- iii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the 413 lb/hr enamel coating booth. (Regulation 7.08, section 3.1.2) (See Comment 1)
- iv. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the 141 lb/hr enamel coating booth. (Regulation 7.08, section 3.1.2) (See Comment 1)
- v. The owner or operator shall utilize process baghouse at all times the process equipment is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution process baghouse equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.16, section 4.1.1)

**b. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**c. TAC**

- i. The owner or operator shall utilize each material recovery device, or equivalent control device, at all times each grit blasting booth and enamel coating booth is in operation and shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 5.21, section 4.3)
- ii. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. PM**

- i. The owner or operator shall either:

- (a) Maintain monthly records of the type and amount of products transferred and maintain records, daily, of the hours of operation. (See Comment 1)
  - or
  - (b) Maintain a record of the daily potential to emit. (See Comment 1)
- ii. The owner or operator shall perform monthly visual inspections of the structural and mechanical integrity of the dust collectors C 233 and C 234 for signs of damage, air leakage, corrosion, etc. and repair as needed.
- iii. The owner or operator shall keep monthly records of the visual inspection of the structural and mechanical integrity of dust collectors C 233 and C 234.
- iv. The owner or operator shall maintain daily records of any periods of time where the process was operating and process baghouse was not operating or a declaration that both process baghouse operated at all times that day when the process was operating.
- v. If there is any-time that the process baghouse device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:
  - (a) Date;
  - (b) Start time and stop time;
  - (c) Identification of the process baghouse and process equipment;
  - (d) PM emissions for each hour during the bypass in lb/hr;
  - (e) Summary of the cause or reason for each bypass event;
  - (f) Corrective action taken to minimize the extent or duration of the bypass event; and
  - (g) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously.
- ii. The opacity surveys should be performed on the exhaust ports for the equipment. If that is not practical, then the room exhaust vents or exterior doors may be utilized.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation. (See Comment 2)

- iv. The owner or operator shall maintain monthly records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record. (See Comment 2)

c. **TAC**

- i. The owner or operator shall maintain records that identify all periods of bypassing the material recovery device while each blast booth and enameling booth is in operation. The record shall include the date, duration (including start and stop time) of each bypass event, identification of the material recovery device and process equipment in operation, the total lb/yr of each TAC during each bypass event, summary information on the cause or reason for each control device bypass event, corrective action taken to minimize the extent and duration of each bypass event, and measures implemented to prevent reoccurrence of the situation that resulted in bypassing the material recovery device.
- ii. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- iii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit a semi-annual compliance report that includes the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 4)

**Responsible Official Certification**

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete."
- The signature and title of the responsible official of the company.

a. **PM**

- i. The owner or operator shall report the following information regarding PM By-Pass Activity in the semi-annual reports.
  - ii. Number of times the PM vent stream by-passes the process baghouse and is vented to the atmosphere;
  - iii. Duration of each by-pass to the atmosphere; and
  - iv. Calculated quantity of lb/hr of PM emitted for each by-pass.
  - v. A negative declaration if no by-passes occurred.
- b. **Opacity**
  - i. The date, time and results of each Method 9 that exceeded the opacity standard.
  - ii. The number of surveys where visible emissions were observed.
  - iii. Description of each corrective action taken.
  - iv. A negative declaration if no visible emissions are observed.
- c. **TAC**
  - i. The owner or operator shall report all periods of bypassing the material recovery device while each grit blasting booth and/or enameling booth was in operation during a reporting period and the environmentally acceptable emission limit is exceeded. The report shall include the date, duration (including start and stop time) of each bypass event, the total lb/yr of each TAC during each bypass event, summary information on the cause or reason for each control device bypass event, corrective action taken to minimize the extent and duration of each bypass event, and measures implemented to prevent reoccurrence of the situation that resulted in bypassing the material recovery device. If there are no periods of bypassing the material recovery device during a reporting period, the owner or operator shall submit a negative declaration for the reporting period.
  - ii. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
  - iii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
  - iv. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.iii.

**U230 Comments**

1. A one-time compliance demonstration has been performed for PM and the standard cannot be exceeded when the process baghouse is utilized. Therefore, there are requirements to determine the PM emissions (lb/hr) during any by-pass of the process baghouse. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the process baghouse.
2. The District has determined that no periodic visible emissions surveys are required for this emission unit.
3. The company proved that the controlled TAC emissions are environmentally acceptable (de minimis) for Manganese, Cobalt and Nickel. Therefore, the source will need to run controls at all times the grit blasting booths and the enamel coating booths are in operation.
4. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semi-annual Report	January 1 through June 30	August 29
2nd Semi-annual Report	July 1 through December 31	March 11

Notes: <sup>1</sup>The date for leap years is February 29.

5. This process was previously permit in construction permit 33262-11-C.

**Emission Unit U40: Rack Prime Dip (AP3)****U40 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.16	Standards of Performance for Existing Large Appliance Surface coating Operations	1 through 6
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U40 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 304	Rack Prime Dip Tank	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		6.16	See SC S1.a.		
EP 305	One (1) Natural Gas Fired Preheat Eclipse Oven rated at 2.6 MMBtu/hr	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		6.16	See SC S1.a.		
		7.08	300 ppm		
		7.09	See SC S1.f		
EP 306	Fluid Bed Prime Drip Chamber	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		6.16	See SC S1.a.		



**U40 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

i. The VOC content of the coatings of the affected facility shall be less than 0.34 kilograms per liter of coating (2.8 pounds per gallon), excluding water and exempt solvents, delivered to the applicators associated with the prime, single or topcoat coating line. (Regulation 6.16, Section 5.1)

or

ii. No person shall cause, allow or permit an affected facility to discharge into the atmosphere more than 15% by weight of the VOCs input into the affected facility unless said person has qualified for an exemption pursuant to Regulation 6.16, section 5.

iii. The owner or operator shall not allow the VOC emissions from emission point (EP305) to exceed 0.97 tons per 12 consecutive month period. (TV permit 155-97-TV(R1)) (See Comment 1)

**b. PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2)

**c. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**d. HAP**

See Appendix B, Specific Condition S1.

**e. NO<sub>x</sub>**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO<sub>x</sub> fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>. (Regulation 7.08, section 4) (See Comment 3)

**f. CO**

The owner or operator of a facility shall not emit carbon monoxide gases from a process unless they are burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level. (Regulation 7.09, section 5.1) (See Comment 4)

**g. SO<sub>2</sub>**

The owner or operator shall not allow the affected facility emissions of the pollutant SO<sub>2</sub> to equal or exceed 40 tons during any twelve consecutive month period. (Regulation 7.09, section 4) (See Comment 5)

Or

The owner or operator shall not cause or allow at an the affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen. (Regulation 7.09, section 4)

h. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)**

a. **VOC**

See Specific Condition S3.a.

b. **PM**

See Specific Condition S3.b.

c. **Opacity**

See Specific Condition S3.c.

d. **HAP**

See Appendix B, Specific Condition S2.

e. **NO<sub>x</sub>**

See Specific Condition S3.e.

f. **CO**

See Specific Condition S3.f.

g. **SO<sub>2</sub>**

See Specific Condition S3.g.

h. **TAC**

See Specific Condition S3.h.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)**

a. **VOC**

i. The owner or operator shall maintain the following records daily:

- (a) The rule number applicable to the operation for which the records are being maintained;
- (b) The application method and substrate type (metal, plastic, paper, etc.);

- (c) The amount and type of adhesive, coatings (including catalyst and reducer for multi-component coatings), solvent, and/or graphic arts material used at each point of application, including exempt compounds;
  - (d) The VOC content as applied in each adhesive, coating, solvent, and/or graphic arts material;
  - (e) The date for each application of adhesive, coating, solvent, and/or graphic arts material;
  - (f) The amount of surface preparation, clean-up, wash-up, of solvent (including exempt compounds) used and the VOC content of each; and
  - (g) The oven temperature when an oven is part of the coating line. (Regulation 6.16, section 6.1)
- ii. VOC content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coating, and inks; using EPA Method 24. (Regulation 6.16, section 6.1)
- iii. The owner or operator shall be allowed to maintain a one time record of the information required in Specific Conditions S3.a.i.(a,b,d) and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
- iv. The owner or operator shall monthly calculate and record the monthly and 12 consecutive monthly VOC emissions for emission point (EP305)
- b. **PM**  
There are no monitoring or record keeping requirements for this equipment. (See Comment 8)
- c. **Opacity**  
There are no monitoring or record keeping requirements for this equipment. (See Comment 9)
- d. **HAP**  
See Appendix B, Specific Condition S3.
- e. **NO<sub>x</sub>**  
There are no monitoring or record keeping requirements for NO<sub>x</sub> compliance (See Comment 3)
- f. **CO**  
There are no monitoring or record keeping requirements for CO compliance (See Comment 4)
- g. **SO<sub>2</sub>**

There are no monitoring or record keeping requirements for SO<sub>2</sub> compliance for meeting the 40 tons during any twelve consecutive months. (See Comment 5)

Or

The owner or operator shall keep a record of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

**h. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 2)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. VOC**

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- ii. Reason for excess emissions;
- iii. The monthly and 12 consecutive month VOC emissions for emission point (EP305);
- iv. Description of corrective action taken to prevent future exceedances; and
- v. A negative declaration if no excess emissions occurred.

**b. PM**

There are no PM compliance reporting requirements for this equipment. (See Comment 8)

c. **Opacity**

There are no Opacity compliance reporting requirements for this equipment. (See Comment 9)

d. **HAP**

See Appendix B, Specific Condition S4.

e. **NO<sub>x</sub>**

There are no compliance reporting requirements for this equipment.

f. **CO**

There are no compliance reporting requirements for this equipment.

g. **SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment for meeting the 40 tons during any twelve consecutive months.

Or

The owner or operator shall submit a one-time report of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

h. **TAC**

i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.f.ii.

### U40 Comments

1. The allowable VOC emissions for this project (U40) were 0.97 tpy which was below the significant level of 40 tpy for PSD/Nonattainment NSR.
2. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period Report</u>	<u>Due Dates</u>
Title V1st Semiannual	January 1 through June 30	August 29
Title V2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

40 CFR 63 Subpart NNNN 1<sup>st</sup> Semi-annual January 1 through June 30 July 31

40 CFR 63 Subpart NNNN 2<sup>nd</sup> Semi-annual July 1 through December 31 January 31

All semi-annual reports can be reported together except for the reports required by 40CFR63 Subpart NNNN unless both compliance deadlines can be achieved.

3. A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.
4. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner.
5. A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.
6. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)
7. Revision R1 allowed for the ovens to be moved from Research and Development use to production activities. Revision R2 allowed for a capacity increase of the Post Heat Oven from 1.4 MMBtu/hr capacity to 1.8 MMBtu/hr due to a change in the designed air flow. Revision R3 allows for a capacity increase of the Post Heat Oven from 1.8 MMBtu/hr capacity to 3.5 MMBtu/hr due to a change in the design.
8. A one-time compliance demonstration has been performed and the lb/hr PM emission standard cannot be exceeded uncontrolled.
9. The District has determined that no periodic visible emissions surveys are required for this emission unit.
10. Emission point E305 was previously permitted on construction permit 29161-10-C(R3) effective date 6/13/2012.

**Emission Unit U42: Fluid Bed Rack Coater (AP3) (Powder Coating)****U42 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, and 5
6.16	Standards of Performance for Existing Large Appliance Surface coating Operations	1 through 6
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U42 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 309	Fluid Bed PVC Rack Coater	6.09	2.58 lb PM/hr	C32 and C33 (Rotoclone)	S32
			Opacity < 20%		
EP 310	One (1) Natural Gas Fired Post Heat Eclipse Oven rated at 3.5 MMBtu/hr	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	S33
		2.12	4.82 tpy		
		6.16	See SC S1.a.		
		7.08	300 ppm		
		7.09	See SC S1.f		

**U42 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The VOC content of the coatings of the affected facility shall be less than 0.34 kilograms per liter of coating (2.8 pounds per gallon), excluding water and exempt solvents, delivered to the applicators associated with the prime, single or topcoat coating line. (Regulation 6.16, Section 5.1)

Or

- ii. No person shall cause, allow or permit an affected facility to discharge into the atmosphere more than 15% by weight of the VOCs input into the affected facility unless said person has qualified for an exemption pursuant to Regulation 6.16, section 5.
- iii. The owner or operator shall not allow the combined VOC emissions from emission points (EP309 and EP310) to not exceed 4.82 tons per 12 consecutive month period. (Regulation 2.12) (Construction Permit 22-91-C (R1)) (See Comment 2)

**b. PM**

The owner or operator shall not allow PM emissions to exceed 2.58 lb/hr. (Regulation 6.09, section 3.2) (See Comment 4)

**c. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

**d. HAP**

See Appendix B, Specific Condition S1.

**e. NO<sub>x</sub>**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO<sub>x</sub> fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>. (Regulation 7.08, section 4) (See Comment 7)

**f. CO**

The owner or operator of a facility shall not emit carbon monoxide gases from a process unless they are burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level. (Regulation 7.09, section 5.1) (See Comment 8)

**g. SO<sub>2</sub>**



The owner or operator shall not allow the affected facility emissions of the pollutant SO<sub>2</sub> to equal or exceed 40 tons during any twelve consecutive month period. (Regulation 7.09, section 4) (See Comment 9)

Or

The owner or operator shall not cause or allow at an the affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen. (Regulation 7.09, section 4)

h. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. **Monitoring (Regulation 2.16, section 4.1.9.1)**

a. **VOC**

See Specific Condition S3.a

b. **PM**

See Specific Condition S3.b

c. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously.

ii. The opacity surveys should be performed on the exhaust ports for the equipment. If that is not practical, then the room exhaust vents or exterior doors may be utilized.

iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

d. **HAP**

See Appendix B, Specific Condition S2

e. **NO<sub>x</sub>**

See Specific Condition S3.e.

f. **CO**

See Specific Condition S3.f.

g. **SO<sub>2</sub>**

See Specific Condition S3.g.

h. **TAC**

See Specific Condition S3.h.

S3. **Record Keeping (Regulation 2.16, section 4.1.9.2)**

a. **VOC**

i. The owner or operator shall maintain the following records daily:

- (a) The rule number applicable to the operation for which the records are being maintained;
- (b) The application method and substrate type (metal, plastic, paper, etc.);
- (c) The amount and type of adhesive, coatings (including catalyst and reducer for multi-component coatings), solvent, and/or graphic arts material used at each point of application, including exempt compounds;
- (d) The VOC content as applied in each adhesive, coating, solvent, and/or graphic arts material;
- (e) The date for each application of adhesive, coating, solvent, and/or graphic arts material;
- (f) The amount of surface preparation, clean-up, wash-up, of solvent (including exempt compounds) used and the VOC content of each; and
- (g) The oven temperature when an oven is part of the coating line. (Regulation 6.16, section 6.1)

ii. VOC content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coating, and inks; using EPA Method 24. (Regulation 6.16, section 6.1)

iii. The owner or operator shall be allowed to maintain a one time record of the information required in Specific Conditions S3.a.i.(a, b, d) and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.

iv. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month combined VOC emissions for emission points (EP309 and EP310).

b. **PM**

There are no monitoring or record keeping requirements for this equipment. (See Comment 4)

c. **Opacity**

The owner or operator shall maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date and time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

d. **HAP**

See Appendix B, Specific Condition

e. **NO<sub>x</sub>**

There are no monitoring or record keeping requirements for NO<sub>x</sub> compliance (See Comment 7)

f. **CO**

There are no monitoring or record keeping requirements for CO compliance (See Comment 8)

g. **SO<sub>2</sub>**

There are no monitoring or record keeping requirements for SO<sub>2</sub> compliance for meeting the 40 tons during any twelve consecutive months. (See Comment 9)

Or

The owner or operator shall keep a record of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

h. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S4. **Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 6)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form

100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- ii. Reason for excess emissions;
- iii. The monthly and 12 consecutive month combined VOC emissions for emission points (EP309 and EP310);
- iv. Description of corrective action taken to prevent future exceedances; and
- v. A negative declaration if there were no exceedances.

b. **PM**

There are no compliance reporting requirements for the equipment. (See Comment 4)

c. **Opacity**

- i. The date, time and results of each Method 9 that exceeded the opacity standard.
- ii. The number of surveys where visible emissions were observed.
- iii. Description of each corrective action taken.
- iv. A negative declaration if no visible emissions are observed.

d. **HAP**

See Appendix B, Specific Condition S4.

e. **NO<sub>x</sub>**

There are no compliance reporting requirements for this equipment.

f. **CO**

There are no compliance reporting requirements for this equipment.

g. **SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment for meeting the 40 tons during any twelve consecutive months.

Or

The owner or operator shall submit a one-time report of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

h. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent

with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

**S5. Stack Testing (Regulation 2.16, section. 4.1.9.1)**

**a. VOC**

If the owner or operator chooses to demonstrate compliance with the VOC standard by not discharging more than 15% by weight of VOCs input into the facility (85% reduction), then the owner or operator shall perform the following compliance test for VOCs:

- i. The owner or operator shall within 180 days of using a coating that is not compliant with Regulation 6.16, Section 5.1, perform an EPA Reference Method performance test within +/- 10% of maximum production on the inlet and outlet of the control device or emission point.
- ii. The owner or operator shall within 180 days of the effective date of this permit perform a capture efficiency test using EPA guidelines.
- iii. The owner or operator shall submit a written compliance test plan that includes the EPA test methods that will be used for compliance testing, the process operating parameters that will be monitored during the compliance test, and the control device performance indicators (e.g. pressure drop) that will be monitored during the compliance test. The compliance test plan shall be furnished to the District at least 30 days prior to the actual date of the compliance test. A Protocol Checklist is listed in Appendix C which contains the information to be submitted in the protocol.
- iv. The owner or operator shall provide the District at least 10 days prior notice of any compliance test to afford the District the opportunity to have an observer present.
- v. The owner or operator shall furnish the District with a written report of the results of the compliance test within 60 days following the actual date of the compliance test.
- vi. The owner or operator shall furnish the District with a compliance monitoring plan using data from the performance test including minimum flow rate within 60 days following the actual date of the compliance test.

The owner or operator shall monitor daily all parameters identified in the plan, which must be approved by the District.

b. **PM**

See Comment 4.

c. **Opacity**

The owner or operator shall demonstrate compliance within 180 days of the effective date of this permit, initially with the opacity limit by conducting a test in accordance with Method 9 of 40 CFR 60 Appendix A at the same time as the Method 5 PM performance test. The performance test shall be conducted within +/- 10% of maximum production. The maximum 6-minute average opacity exhibited during the test period shall be used to determine whether the affected source is in initial compliance with the standard. The duration of the Method 9 performance test shall be 3 hours (30 6-minute averages).

d. **HAP**

There are no testing requirements for this pollutant.

e. **TAC**

There are no testing requirements for this pollutant.

#### **U42 Comments**

1. The allowable VOC emissions are below the significant level of 40 tpy for PSD/Nonattainment NSR.
2. The allowable VOC emissions for EP309 and EP310 are below the significant level of 40 tpy for PSD/Nonattainment NSR.
3. The potential controlled PM/PM<sub>10</sub> emissions for this project were 1.87 tpy, which was below the significant levels of 25 tpy / 15 tpy respectively for PSD/Nonattainment NSR.
4. A stack test was performed on August 10, 2010 and the results were submitted to the District on September 29, 2010. The test yielded an average emission rate 0.08 pounds of particulate per hour from the Fluid Bed Rack Coater. Based on the results, GE no longer needs to utilize the rotoclones (emission points C32 and C33) in conjunction with the Fluid Bed Rack Coater process. In addition, GE will no longer perform particulate matter monitoring, record keeping, or reporting emission unit number U42.
5. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

40 CFR 63 Subpart NNNN 1<sup>st</sup> Semi-annual January 1 through June 30 July 31

40 CFR 63 Subpart NNNN 2<sup>nd</sup> Semi-annual July 1 through December 31 January 31

All semi-annual reports can be reported together except for the reports required by 40CFR63 Subpart NNNN unless both compliance deadlines can be achieved.

6. The VOC emission limit is from the combination of the following permits 22-91, 23-91, 24-91, 25-91, and 11-95 including the following banking references:

Banking Ledger	Date	VOC Emissions
43104-045	7/30/1991	2.5 tpy
43104-048	7/30/1991	0.25 tpy
43104-049	7/30/1991	0.75 tpy
43104-080	1/9/1995	1.32 tpy
Total		4.82 tpy

7. A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.
8. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner.
9. A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.
10. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)
11. Revision R1 allowed for the ovens to be moved from Research and Development use to production activities. Revision R2 allowed for a capacity increase of the Post Heat Oven from 1.4 MMBtu/hr capacity to 1.8 MMBtu/hr due to a change in the designed air flow. Revision R3 allows for a capacity increase of the Post Heat Oven from 1.8 MMBtu/hr capacity to 3.5 MMBtu/hr due to a change in the design.
12. A one-time compliance demonstration has been performed and the lb/hr PM emission standard cannot be exceeded uncontrolled.
13. The District has determined that no periodic visible emissions surveys are required for this emission unit.
14. Emission Point E110 was previously permitted on construction permit 29161-10-C(R3) effective date 6/13/2012.

**Emission Unit U311: Adhesive for End Caps on Dishwasher Racks (AP3)****U311 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standards of Performance for New Source Using Volatile Organic Compounds	1 through 4
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U311 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
AP3-311	Nylon Rack End Cap Adhesive	40 CFR 63 Subpart NNNN	See Appendix B, SC S1.	N/A	N/A
		7.25	See SC.S1.a.i.		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 2		



**U311 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall not allow or cause the VOC emissions from equipment subject to Regulation 7.25, for emissions that do not have a BACT limit, to equal or exceed five (5) tons, plantwide, during any consecutive 12-month period. (Regulation 7.25, section 5.1) (See Comment 1)

**b. HAP**

See Appendix B, Specific Condition S1.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 2)

**S2. Monitoring And Record Keeping (Regulation 2.16, section 4.1.9.1)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. VOC**

The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance in Specific Condition S1.a.

**b. HAP**

See Appendix B, Specific Condition S2 and S3.

**c. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit a semi-annual compliance report that includes the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

### Responsible Official Certification

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete."
- The signature and title of the responsible official of the company.

#### a. VOC

For the 5 tpy VOC limit:

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- ii. Reason for excess emissions; and
- iii. Description of corrective action taken to prevent future exceedances.
- iv. A negative declaration if there were no exceedances.

#### b. HAP

See Appendix B, Specific Condition S4.

#### c. TAC

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

### U311 Comments

1. Equipment subject to the plantwide 5 ton per year VOC emission limit in Regulation 7.25 are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-C(R1), Bottom Mount Freezer Refrigerator touch-up painting, High Efficiency Hot Water Heater touch-up painting, Non-PVC Rack Cap adhesive, and Insignificant Activities.
2. The potential uncontrolled TAC emissions are found to be de minimis for this project.

3. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semi-annual Report	January 1 through June 30	August 29
2nd Semi-annual Report	July 1 through December	31 March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

40 CFR 63 Subpart NNNN

1st Semi-annual January 1 through June 30 July 31

40 CFR 63 Subpart NNNN

2nd Semi-annual July 1 through December 31 January 31

All semi-annual reports can be reported together except for the reports required by 40 CFR 60 Subpart NNNN unless both compliance deadlines can be achieved.

4. This process was previously permitted on construction permit 34823-12-C.

**Emission Unit U310: Nylon Rack Fluidized Bed Coating (AP3)****U310 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3
7.09	Standards of Performance for New Process Gas Streams	1 through 5
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 6
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>U310 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
AP3-310	Nylon Rack Coater Preheat Oven 4.5 MMBtu/hr	7.09	See SC.S1.e.f. and g.	N/A	S-AP3Np
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 6		
AP3-310a	Nylon Rack Coater 353 lb/hr Fluidized Bed	40 CFR 63 Subpart NNNN	See Appendix B, SC S1	N/A	N/A
		7.08	2.34 lb PM/hr		
		7.59	Opacity < 20%		
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See SC.S1.a.		
AP3-310b	Nylon Rack Coater Postheat Oven 1.5 MMBtu/hr	7.09	See SC.S1.e.f. and g.	N/A	S-AP3N
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 6		

**U310 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from equipment subject to Regulation 7.59 **plantwide** to exceed 5 tons during any 12 consecutive month period unless compliant coatings listed in Specific Condition S1.a.ii. are used. (Regulation 7.59, section 5.2)

Or

- ii. The owner or operator shall not allow or cause the emissions of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the applicable emission rate as follows: (Regulation 7.59, section 3.1)
  - (a) 0.52 kg of VOC/l (4.3 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for clear coatings, (Regulation 7.59, section 3.1.1)
  - (b) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for air-dried coatings, (Regulation 7.59, section 3.1.2)
  - (c) 0.42 kg of VOC/l (3.5 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for extreme performance coatings, or (Regulation 7.59, section 3.1.3)
  - (d) 0.36 kg of VOC/l (3.0 lb of VOC/gal) of coating, excluding water and exempt solvents, as applied for all other coatings. (Regulation 7.59, section 3.1.4)

**b. PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the fluidized bed. (Regulation 7.08, section 3.1.2) (See Comment 1)

**c. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1) (See Comment 2)

**d. HAP**

See Appendix B, Specific Condition S1.

**e. NO<sub>x</sub>**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility or from any air pollution control equipment installed on any affected facility any NO<sub>x</sub> fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>. (Regulation 7.08, section 4) (See Comment 3)

**f. CO**

The owner or operator of a facility shall not emit carbon monoxide gases from a process unless they are burned at 1,300°F for 0.5 seconds or greater in a direct flame afterburner or equivalent device equipped with an indicating pyrometer that is positioned in the working area at the operator's eye level. (Regulation 7.09, section 5.1) (See Comment 4)

g. **SO<sub>2</sub>**

The owner or operator shall not allow the affected facility emissions of the pollutant SO<sub>2</sub> to equal or exceed 40 tons during any twelve consecutive month period. (Regulation 7.09, section 4) (See Comment 5)

Or

The owner or operator shall not cause or allow an affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 28.63 grains per 100 dscf at 0% excess oxygen. (Regulation 7.09, section 4)

h. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 6)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)

- (a) The regulation and section number applicable to the affected facility for which the records are being maintained,
- (b) The application method and substrate type (metal, plastic, etc.),
- (c) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month,
- (d) The VOC content as applied in each coating and solvent,
- (e) The date, or usage record period, for each application of coating and solvent,

- (f) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month.
    - (g) Oven temperature, monthly, where applicable.
  - ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
  - iii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
  - iv. The owner or operator shall be allowed to maintain a one-time record of the information required in Specific Conditions S2.a.i.(a,b,d) and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.
  - v. The owner or operator shall, monthly, calculate the monthly and 12 consecutive month VOC emissions from the post heat oven.
- b. **PM**  
There are no monitoring or record keeping requirements for this equipment (See Comment 1)
- c. **Opacity**  
There are no monitoring or record keeping requirements for this equipment (See Comment 2)
- d. **HAP**  
See Appendix B, Specific Conditions S2 and S3.
- e. **NOx**  
There are no monitoring or record keeping requirements for this equipment. (See Comment 3)
- f. **CO**  
There are no monitoring or record keeping requirements for this equipment. (See Comment 4)
- g. **SO2**  
There are no monitoring or record keeping requirements for SO2 compliance for meeting the 40 tons during any twelve consecutive month period limit. (See Comment 5)



Or

The owner or operator shall keep a record of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

**h. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results. (See Comment 6)
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S3. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit a semi-annual compliance report that includes the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance report shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period (See Comment 7)

**Responsible Official Certification**

All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the “Responsible Official” occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete.”
- The signature and title of the responsible official of the company.

**a. VOC**

- i. If compliant coatings aren’t used:
  - (a) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
  - (b) The monthly and 12 consecutive month VOC emissions;
  - (c) Reason for excess emissions;
  - (d) Description of corrective action taken to prevent future exceedances; and
  - (e) If the 5 tpy plantwide VOC limit is exceeded, the VOC lb/gal as applied.
  - (f) A negative declaration if no excess emissions occurred.

**b. PM**

There are no compliance reporting requirements for this equipment.

c. **Opacity**

There are no compliance reporting requirements for this equipment.

d. **HAP**

See Appendix B, Specific Condition S4.

e. **NO<sub>x</sub>**

There are no compliance reporting requirements for this equipment.

f. **CO**

There are no compliance reporting requirements for this equipment.

g. **SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment for meeting the 40 tons during any twelve consecutive month period limit.

Or

The owner or operator shall submit a one-time report of the determination of the process gas stream concentration and if it exceeds the sulfur dioxide limit.

h. **TAC**

i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze.  
(Regulation 5.21 sections 4.22 – 4.24)

iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.h.ii.

**U310 Comments**

1. A one-time PM compliance demonstration for this equipment was performed on 9/23/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.
2. The District has determined that no periodic visible emissions surveys are required for this emission unit.
3. A one-time NO<sub>x</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded.

Therefore, there are no monitoring, record keeping, and reporting requirements with respect to NO<sub>x</sub> emission limits.

4. The CO emissions from the process are created by the combustion of natural gas to generate heat. The nominal flame temperature of greater than 2,000°F, exceeds the 1,300°F temperature requirement of 7.09, section 5.1, therefore the District has determined that this will be equivalent to a direct flame afterburner.
5. A one-time SO<sub>2</sub> compliance demonstration using AP-42 emission factors and combusting natural gas was performed, and the emission standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to SO<sub>2</sub> emission limits.
6. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)
7. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1 <sup>st</sup> Semi-annual Report	January 1 through June 30	August 29
2 <sup>nd</sup> Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

8. New Insignificant Activities include brazing, soldering or welding and Nylon powder transfer/clean-up activities.
9. This equipment was previously permitted on construction permit 33667-11-C.

**Emission Units U81 and U82: Gas-fired Boiler 6 and Boiler 8 (AP20)****U81 and U82 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1,2,3.1,3.2,3.3 and 4.1
6.42	Reasonably Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, 5
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, and 4
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	40 CFR 60.40c(a)

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Subject</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6
7.02	Adoption of Federal New Source Performance Standards	1, 2, 3.55, 4, 5

**U81 and U82 Allowable Emissions:**

<b>U81 and U82 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 908	Boiler # 6 rated at 180 MM Btu/hr while combusting both natural gas and landfill gas; however, only 90.8 MM Btu/hr while solely combusting natural gas; equipped with low NO <sub>x</sub> burners	6.07	Opacity ▶ 20%	N/A	SU81
			PM < 0.28 lb/MM Btu		
			SO <sub>2</sub> < 0.92 lb/MM Btu		
EP 909	Natural gas fired boiler #8 rated at 60.9 MM Btu/hr with landfill gas as backup	7.06	PM ▶ 0.21 MM Btu/hr	N/A	SU81
			SO <sub>2</sub> ▶ 1 MM Btu/hr		
		5.00, 5.01, 5.20, 5.21, 5.22, and 5.23	See S.C. S1.a.		
		40 CFR 60 Subpart Dc	See S.C. S3.b.		

**U81 and U82 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. TAC**

- i. For boiler #8, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis (Regulations 5.00 and 5.21) (See Comment 2)
- ii. For boiler #8, the owner or operator shall only combust natural gas or landfill gas. (Regulation 5.21, section 4.3)(Construction Permit 179-07-C, dated 6/8/2007)

**b. SO<sub>2</sub>**

- i. For boiler #6:  
The owner or operator shall not allow the emission of SO<sub>2</sub> to exceed 0.92 lb/MM Btu on a 24 hour average basis. (Regulation 6.07, section 4.1) (See Comment 1)
- ii. For boiler #8:  
The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 1 pound per million BTU actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1) (See Comment 1)

**c. PM**

- i. For boiler #6:  
The owner or operator shall not allow the emission of PM to exceed 0.28 lb/MM Btu on a 24 hour average basis. (Regulation 6.07, section 3.1)
- ii. For boiler #8:  
The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.21 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.4) (See Comment 1)

**d. Opacity**

The owner or operator shall not cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20%. (Regulation 6.07, sections 3.2 and 3.3; and Regulation 7.06, section 4.2)

**e. NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit. (Regulation 6.42, section 4)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)**

- a. **TAC**  
See Specific Condition S3.a.
- b. **SO<sub>2</sub>**  
See Specific Condition S3.b.
- c. **PM**  
There are no monitoring requirements for this pollutant. (See Comment 1)
- d. **Opacity**  
There are no monitoring requirements for this pollutant. (See Comment 7)
- e. **NO<sub>x</sub>**  
The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)**

- a. **TAC**
  - i. For boiler #8 rated at 60.9 MM Btu per hour:
    - (a) The owner or operator shall maintain a record of the TAC content and concentrations in the landfill gas either from a fuel analysis or from the fuel supplier.
    - (b) See Specific Condition S3.b
  - ii. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results. (See Comment 7)
  - iii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions..
- b. **SO<sub>2</sub>**
  - i. For Boiler #8, the owner or operator shall keep records of the amount of each fuel combusted during each month. (40 CFR 60.48c(g) as modified by EPA letter dated March 7, 2002) (See Comment 3)
  - ii. For boiler #8, the owner or operator shall keep a monthly record of the hours of operation.
- c. **PM**  
There are no recordkeeping requirements for this equipment. (See Comment 1)
- d. **Opacity**  
There are no recordkeeping requirements for this equipment. (See Comment 7)
- e. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 4)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. TAC**

- i. For the standby boiler #8 rated at 60.9 MM Btu per hour: The owner or operator shall submit notification to the District for approval prior to any raw material change that causes an appreciable increase in the TAC content or adds additional TACs not identified in the permit application. (Regulation 2.03, section 5.1)
- ii. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- iii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iv. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S3.a.iii.

**b. SO<sub>2</sub>**

There are no compliance reporting requirements for this equipment.

**c. PM**



There are no compliance reporting requirements for this equipment. (See Comment 1)

d. **Opacity**

There are no compliance reporting requirements for this equipment. (See Comment 7)

e. **NO<sub>x</sub>**

The owner or operator shall comply with the NO<sub>x</sub> RACT Plan attached to this permit.

**U81 and U82 Comments**

1. One-time PM and SO<sub>2</sub> compliance demonstrations have been performed for the standby boiler on 5/14/2007 and for the remaining boilers on 4/3/2007, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to PM and SO<sub>2</sub> emission limits for regulations 6.07 and 7.06. The record keeping specified above is to show compliance with 40 CFR 60 Subpart D<sub>C</sub>.
2. A one-time compliance demonstration has been performed on 5/14/07 for TACs for the standby boiler and the boiler is environmentally acceptable for TACs.
3. In a letter dated March 7, 2002 from EPA Region 4, EPA has identified certain types of alternative record keeping requirements for units that are regulated under 40 CFR 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) that can be approved by the District without additional input from EPA.
4. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

5. In 1998, the company converted Boiler #6 from coal to natural gas and landfill gas. The emissions from this modification are below the significant levels for PSD and NSR.
6. The coal fired boilers 1-5 were permanently disabled since the stokers feeding units have been physically cut preventing receiving and feeding of coal. Also, gas-fired boiler #7 has been removed from the permit per correspondence dated September 25, 2008.
7. The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard in Regulation 7.06 and 6.07. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
8. The federal regulation 40 CFR 63, Subpart DDDDD was recently finalized and this revision (R2) is an administrative revision, therefore, the District has not included the boiler MACT requirements in this permit. The company has submitted the Part 1 and 2

112j permit application for the boiler MACT (40 CFR 63 Subpart DDDDD), which was received March 6, 2009 and May 8, 2008 respectively.

9. The description of boiler #6 has been revised as the company requested on June 28, 2011.

**Emission Unit U87: Gasoline Storage Tanks****U87 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.40	Standards of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery)	1.3
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks ( Stage One Vapor Recovery )	1 through 6

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U87 Allowable Emissions:**

<b>U87 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
Tank No. 900	Underground Gasoline Storage Tank, AP26; 6000 gal	7.15	See S.C.S1.	N/A	N/A
		6.40	< 10,000 gal/month		

**U87 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC (Regulation 7.15, section 3 and Regulation 6.40, section 1.3)**

- i. The owner or operator shall install, maintain and operate the storage tank with a submerged fill pipe, vent line restrictions, a vapor balance system, and vapor tight connections on the liquid fill and vapor return hoses.
- ii. The owner or operator shall not allow delivery of fuel to the storage tanks until the vapor balance system is properly connected.
- iii. The owner or operator shall not allow delivery of gasoline to a service station without connecting the vapor return hose between the tank of the truck and the storage tank receiving the product.
- iv. The owner or operator shall maintain all above ground tanks with dry breaks
- v. The owner or operator shall operate and maintain equipment with no defects and all fill tubes shall be equipped with vapor-tight covers including gaskets; all hoses, fittings and couplings shall be in vapor-tight condition; and all dry breaks shall have vapor tight seals and shall be equipped with vapor tight covers or dust covers
- vi. The owner or operator shall not exceed 10,000 gallons of throughput per month, in order to be exempted from Regulation 6.40, except for the recordkeeping and reporting requirements. (Regulation 6.40, section 1.3)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

See Specific Condition S3.a.

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

The owner or operator shall keep a record of the amount of throughput of gasoline per month to determine compliance with Specific Condition S1.a.vi. (Regulation 6.40, section 3.1.1)

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. VOC**

The owner or operator shall submit a report by April 15 of every year showing that they are still exempt from Regulation 6.40. (Regulation 6.40, section 1.3)

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**U87 Comment**

1. The following tank has been removed:  
Tank 128, Aboveground Gasoline Storage Tank, AP1; 300 gal
2. Emissions from motor vehicle fueling or refueling are de minimis in accordance with District Regulation 5.21, section 2.6.

**Emission Unit U89: VOC Storage Tank installed before September 1, 1976****U89 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.13	Standards of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U89 Allowable Emissions:**

<b>U89 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
Tank No. 307	Primer Holding Tank; 1200 gal	6.13	See S.C. S1.	N/A	N/A

**U89 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall store VOCs in vessels equipped with a permanent submerged fill pipe, if the true vapor pressure of the VOC, as stored, is equal to or greater than 1.5 psia. (Regulation 6.13, section 3.3)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

See Specific Condition S3.a. (See Comment 1).

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

The owner or operator of the storage vessel shall maintain records of the material stored in the storage vessel and if the contents of the storage vessel are changed; a record shall be made of the new contents, the new vapor pressure, and the date of change. (See Comment 1)

**b. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

*Responsible Official Certification*



All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

There are no compliance reporting requirements for this equipment.

b. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze.  
(Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**U89 Comment**

1. This is required to verify compliance with the standard in 6.13 Section 3.3.

**Emission Units U100: ABS Extruder (AP5)****U100 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U100 Allowable Emissions:**

<b>U100 Emission Point</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
U100, EP 540	Cabinet Liner Extruder	7.25	3.54 tpy (BACT)	N/A	N/A

**U100 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall limit VOC emissions to 3.54 tpy or less for emission point U100. (Construction Permit # 210-01) (Regulation 7.25, section 3.1)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00- and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

See Specific Condition S3.a.

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

i. The owner or operator shall keep a record of the amount VOC material used each month.

ii. The owner or operator shall calculate the monthly and 12 consecutive month VOC emissions each month in order to demonstrate compliance with the 3.54 tpy limit in Specific Condition S1.a.i.

**b. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- ii. Reason for excess emissions;
- iii. Description of corrective action taken to prevent future exceedance; and
- iv. A negative declaration if no excess emissions occurred.

b. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**U100 Comments**

1. The potential VOC emissions for U100 is below the significant level of 40 tpy for PSD/Nonattainment NSR.
2. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

**Emission Units U500: Touch-Up Paint, Adhesives and Lubricating the Spine Fin  
Evaporator Bottom Mount Freezer Refrigerator Line (AP5)**

**U500 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	63.4080 through 63.4181

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 and 4.75
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U500 Allowable Emissions:**

<b>U500 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP-500	Touch-Up Paint, Adhesives and Lubricating the Spine Fin Evaporator	7.25	26.9 tpy (BACT)	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 4		
		40 CFR 63 Subpart NNNN	See Appendix B, SC S1.		

**U500 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. The owner or operator shall not allow or cause the VOC emissions from the use of lubricant to exceed 26.9 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Construction Permit 33373-11-C(R1) effective date 10/31/2012) (See Comment 1)
- ii. The owner or operator shall contain the lubricant within closed reservoirs to reduce evaporation loss. (Regulation 7.25, section 3) (BACT) (Construction Permit 33373-11-C(R1) effective date 10/31/2012) (See Comment 1)
- iii. The amount of lubricant shall be limited by concentrating the spray pattern directly at the mandrel and maximizing the number of bends made per spray. (Regulation 7.25, section 3) (BACT) (Construction Permit 33373-11-C(R1) effective date 10/31/2012) (See Comment 1)
- iv. At no time shall the per unit usage of lubricant exceed 1.05 oz per evaporator. (Regulation 7.25, section 3) (BACT) (Construction Permit 33373-11-C(R1) effective date 10/31/2012) (See Comment 2)
- v. The owner or operator shall not allow or cause the VOC emissions from equipment subject to Regulation 7.25, for emissions that do not have a BACT limit, to not equal or exceed five (5) tons, plantwide, during any consecutive 12-month period. (Regulation 7.25, section 5.1) (See Comment 3)

**b. HAP**

See Appendix B, Specific Condition S1.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and section 4.1.9.2)****a. VOC**

- i. The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance with the 26.9 tpy limit in Specific Condition S1.a.
- ii. The owner or operator shall, weekly, record the amount of lubricant used and the number of units manufactured. The amount of lubricant used per unit shall then be calculated and recorded to demonstrate the concentration of the spray pattern directly at the mandrel and maximizing the number of

bends per spray.

- iii. The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance with the 5 ton per year limit for all equipment subject to Regulation 7.25 and do not have a BACT limit.

b. **HAP**

See Appendix B, Specific Condition S2 and S3.

c. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

S3. **Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 5)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

- i. For 26.9 tpy BACT limit:
  - (a) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
  - (b) Reason for excess emissions; and
  - (c) Description of corrective action taken to prevent future exceedances.
  - (d) A negative declaration if there were no exceedances.
- ii. The owner or operator shall identify all periods of exceeding the

concentration of the spray pattern directly at the mandrel and maximizing the number of bends per spray. A negative declaration shall be included if there are no instances of exceedance.

iii. For 5 tpy limit:

- (a) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- (b) Reason for excess emissions; and
- (c) Description of corrective action taken to prevent future exceedances.
- (d) A negative declaration if there were no exceedances.

b. **HAP**

See Appendix B, Specific Condition S4.

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

**U500 Comments**

- 1. The VOC limit of 26.9 tons per year is based upon a BACT for Regulation 7.25. The company originally submitted the BACT on August 31, 2011 and the District requested clarification on several issues in the BACT. The company then submitted a response to the District's concerns on September 7, 2011 and the District approved the revised BACT on September 8, 2011. The good management practices are included in the BACT.
- 2. The BACT states that the Cindol usage rate is 0.6 ounces per unit or less. This is an annual average based on similar equipment operated at another GE Appliances' manufacturing facility. The source determined a site-specific amount of lubricant used per unit emission limit is 1.05 oz per evaporator. This is based off of maximum equipment capacity and a 5% addition for wear.
- 3. Equipment subject to the plantwide 5 ton per year VOC emission limit in Regulation 7.25 are U149 touch-up painting, U150 touch-up painting, touch-up paint booths (320-92-



C(R1), Bottom Mount Freezer Refrigerator touch-up painting and Insignificant Activities.

4. The potential uncontrolled TAC emissions are found to be de minimis for assembly activities.
5. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1 <sup>st</sup> Semi-annual Report	January 1 through June 30	August 29
2 <sup>nd</sup> Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

6. New Insignificant Activities include cleaners and lubricants which Regulation 7.25 is still applicable.

**Emission Units U510: Bottom Mount Freezer Refrigerator Line (AP5)****U510 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.12	Emissions Trading (Including Banking and Bubble Rules)	1 through 6
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U510 Allowable Emissions:**

<b>U510 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP-510	Insulating Foam Line (IFL-1)	7.25	32.4 tpy (BACT)	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 3		
EP-511	Bottom Mount Freezer Refrigerator Main Extruder Line (3,000 lb/hr)	2.12 7.25	3.84 tpy (BACT) for both Extruders	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 3		
EP-512	Bottom Mount Freezer Refrigerator Small Extruder Line (800 lb/hr)	2.12 7.25	3.84 tpy (BACT) for both Extruders	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See Comment 3		

**U510 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. For the insulating foam line, the owner or operator shall not allow or cause the VOC emissions from this equipment to exceed 32.4 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT) (Construction Permit 33318-11-C effective date 9/27/2011) (See Comment 1)
- ii. The owner or operator shall follow the equipment manufacturer's recommendations for the maintenance of the critical foam system equipment. (Regulation 7.25, section 3) (BACT) (Construction Permit 33318-11-C, effective date 9/27/2011) (See Comment 1)
- iii. For the extruders, the owner or operator shall not allow or cause the VOC emissions from this equipment to exceed 3.84 tons during any consecutive 12-month period combined. (Regulation 7.25, section 3) (BACT) (Construction Permit 33671-11-C effective date 11/23/2011) (Regulation 2.12) (See Comment 2)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 3)

**S2. Monitoring and Record Keeping (Regulation 2.16, section 4.1.9.1 and section 4.1.9.2)****a. VOC**

- i. The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance with the 32.4 tpy limit in Specific Condition S1.a.i.
- ii. The owner or operator shall, monthly, calculate and record the monthly and 12 consecutive month VOC emissions in order to demonstrate compliance with the 3.84 tpy limit in Specific Condition S1.a.iii.
- iii. The owner or operator shall keep a record of the amount of VOC material extruded each month.
- iv. The owner or operator shall maintain a copy of the equipment manufacturer's recommendations for the maintenance of the critical foam system equipment that shall include a comprehensive list of all the components to be maintained. Also, records shall be maintained that demonstrate the maintenance is being performed in accordance with the manufacturer's recommendations.

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S3. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 5)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. VOC**

- i. For the 32.4 and 3.84 tpy VOC limit:
  - (a) Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
  - (b) Reason for excess emissions; and
  - (c) Description of corrective action taken to prevent future exceedances.
  - (d) A negative declaration if there were no exceedances.
- ii. The owner or operator shall report any missed manufacturer recommended maintenance operations.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR

program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

- iii. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- iv. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- v. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

#### **U510 Comments**

1. The VOC limit of 32.4 tons per year is based upon a BACT for Regulation 7.25. The company originally submitted the BACT on August 8, 2011 and the District requested clarification on several issues in the BACT. The company then submitted the revised BACT on August 19, 2011 and the District approved the revised BACT on August 22, 2011. The maintenance recommendations for the maintenance of the critical foam system equipment are included in the BACT.
2. The company requested removal of emissions from the bank on October 14, 2011 to set a VOC limit of 3.84 tpy for this extrusion equipment. These requested emissions were removed from banking permit 12-02-B.
3. The company performed a STAR Environmental Acceptability Demonstration for Acrylonitrile (Category 1 TAC), Ethyl benzene (Category 4 TAC) and Styrene (Category 4 TAC) emissions. It was shown that the emissions exceeded the De Minimis level for these three TACS. A SCREEN3 Model was used to calculate a MAC based on site specific and default dispersion parameters and meteorological data. This was then used with BAC to determine the risk. For Acrylonitrile the risk was determined to be  $0.825 \times 10^{-6}$ , for Ethyl benzene the risk was determined to be  $0.057 \times 10^{-6}$  and for Styrene the risk was determined to be  $0.150 \times 10^{-6}$ . These are each below the maximum allowable risk of  $1.0 \times 10^{-6}$  for this project. The combined TAC risk is  $1.032 \times 10^{-6}$  which is below the maximum allowable risk of  $3.8 \times 10^{-6}$ . The current plantwide total risk is  $3.26 \times 10^{-6}$  so by adding the new risk the new plantwide total risk is  $4.29 \times 10^{-6}$ , which is still less than  $7.5 \times 10^{-6}$ . The STAR Environmental Acceptability for this plant has been demonstrated. The STAR EA Demonstration has been accepted by the District. The following TACs were De Minimis uncontrolled: Acetophenone, Cumene, Polymeric diphenylmethane diisocyanate and MDI.

4. The owner or operator submitted to the District the equipment manufacturer's recommendations for the maintenance of the critical foam system equipment on July 9, 2012.
5. The semi-annual compliance reports are due on or before the following date of each calendar year:

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semi-annual Report	January 1 through June 30	August 29
2nd Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes: <sup>1</sup>The date for leap years is February 29.

**Emission Units U104 - U107: Steel Parts Fabrication (AP2)****U104 - U107 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U104 – U107 Allowable Emissions:**

<b>U104 - U107 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 224	Lubricator for Door Panel Press #25001	7.25	3 tpy (BACT)	N/A	N/A
EP 225	Lubricator for Door Panel Press #25002			N/A	N/A
EP 226	Lubricator for Toe Panel Press #25378	5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.	N/A	N/A
EP 227	Lubricator for Access Panel Press #58737			N/A	N/A



**U104 - U107 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

The owner or operator shall not allow VOC emissions to exceed 3 tons per year combined for emission points (U104-U107). (Construction Permit # 185-01, issued on May 30, 2001) (Regulation 7.25, section 3.1) (See Comment 1)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

There are no monitoring requirements for this equipment. (See Comment 1)

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

There are no record keeping requirements for this equipment. (See Comment 1)

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

***Responsible Official Certification***

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form

100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

There is no compliance reporting requirement for this equipment.

b. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**U104 - U107 Comments**

1. The potential combined VOC emissions for emission points (U104-U107) is below the limit listed in Specific Condition S1. based on one-time compliance demonstrations dated December 2, 2002 and April 28, 2003. Therefore, there are no monitoring, recordkeeping, or reporting requirements for this standard.
2. The potential VOC emissions for this project were 0.17 tpy, which was below the significant level of 40 tpy for PSD/Nonattainment NSR.

**Emission Unit U108: Stainless Steel Dishwasher Tub Line (AP2)****U108 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.05	Prevention of Significant Deterioration of Air Quality	1, 2
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U108 Allowable Emissions:**

<b>U108 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 230	Three tub wrap presses	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 231	Tub wrap mastic station	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 232	Bake oven for tub wrap	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 233	Tub top and bottom mastic station	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 234	Bake oven for tub top and bottom	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 235	Tub top and bottom silicone station	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		
EP 236	Tub assembly gasket retainer silicone station	2.05, 7.25	38 tpy (BACT) combined 726,500 tubs/12 Consecutive Months combined	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.b.		

**U108 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC (Regulation 7.25, section 3.1)**

- i. The owner or operator shall not allow VOC emissions to exceed 38 tons per 12 consecutive month period for all emission points combined in U108 in order to avoid PSD. (Regulation 2.05; Construction Permit # 263-01, issued on September 18, 2001) (See Comment 1)
- ii. The owner or operator shall not allow the production of more than 726,500 tubs per 12 consecutive month period for all emission points combined in U108 in order to avoid PSD. (Regulation 2.05; Construction Permit # 263-01, issued on September 18, 2001) (See Comment 1)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.  
(Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. VOC**

See Specific Condition S3.a.

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

- i. The owner or operator shall maintain current MSDSs for all coatings used.
- ii. The owner or operator shall monthly record the quantity of each VOC containing material used. The owner or operator shall monthly calculate the VOC emissions for the month and the 12 consecutive month period.
- iii. The owner or operator shall record the number of tubs produced each month and calculate the number of tubs produced that 12 consecutive month period in order to demonstrate compliance with the 726,500 tub/12 consecutive month period limit.

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental

acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 2)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. VOC**

- i. Identification of all periods of exceedances of the VOC emission limit or the production limit including the quantity of excess emissions;
- ii. Reason for excess emissions; and
- iii. Description of corrective action taken to prevent future exceedances.
- iv. A negative declaration if there were no exceedances.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**U108 Comments**

1. The VOC limit of 38 tons per year is BACT for Regulation 7.25 and a PSD avoidance limit.
2. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup>

The date for leap years is February 29.

**Emission Unit U109: Abrasive Blasting (Hanger Paint Stripping Process (AP2))****U109 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.14	Hazardous Air Pollutants and Source Categories	1 through 3
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U109 Allowable Emissions:**

<b>U109 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP 239	One (1) abrasive blasting unit by Blastec utilizing steel shot rated at 320,000 lbs blast media/hr.	7.08	PM < 38.99 lb/hr	C109 (Cartridge Type Dust Collector) & C110 (Safety Monitoring Filter)	N/A
			Opacity < 20%		



**U109 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. PM**

- i. The owner or operator shall not allow PM emissions to exceed 38.99 lb/hr. (Regulation 7.08, section 3.1.2) (See Comment 1)
- ii. The owner or operator shall utilize controls at all times the process equipment is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 2.16, section 4.1.1)

**b. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. PM**

The owner or operator shall perform monthly visual inspections of the structural and mechanical integrity of the dust collectors C109 and C110 for signs of damage, air leakage, corrosion, etc. and repair as needed.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously.
- ii. The opacity surveys should be performed on the exhaust ports for the equipment. If that is not practical, then the room exhaust vents or exterior doors may be utilized.
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation. (See Comment 2)

**c. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. PM**

i. The owner or operator shall either:

(a) Maintain monthly records of the type and amount of products transferred and maintain records, daily, of the hours of operation. (See Comment 1)

or

(b) Maintain a record of the daily potential to emit. (See Comment 1)

ii. The owner or operator shall keep monthly records of the visual inspection of the structural and mechanical integrity of dust collectors C109 and C110.

iii. The owner or operator shall maintain daily records of any periods of time where the process was operating and either control device C109 and C110 was not operating or a declaration that both control devices operated at all times that day when the process was operating.

iv. If there is any-time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:

(a) Date;

(b) Start time and stop time;

(c) Identification of the control device and process equipment;

(d) PM emissions for each hour during the bypass in lb/hr;

(e) Summary of the cause or reason for each bypass event;

(f) Corrective action taken to minimize the extent or duration of the bypass event; and

(g) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

**b. Opacity**

The owner or operator shall maintain monthly records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**c. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**a. PM**

- i. The owner or operator shall report the following information regarding PM By-Pass Activity in the semi-annual reports.
- ii. Number of times the PM vent stream by-passes the control device and is vented to the atmosphere;
- iii. Duration of each by-pass to the atmosphere; and
- iv. Calculated quantity of tons of PM emitted for each by-pass.
- v. A negative declaration if no by-passes occurred.

**b. Opacity**

- i. The date, time and results of each Method 9 that exceeded the opacity standard.
- ii. The number of surveys where visible emissions were observed.
- iii. Description of each corrective action taken.
- iv. A negative declaration if no visible emissions are observed.

**c. TAC**

- i. The owner or operator shall report any conditions that were inconsistent

with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S3.c.ii.

### **U109 Comments**

- 3. A one-time compliance demonstration has been performed on 4/23/07 for PM and the standard cannot be exceeded controlled. The monthly through-put records and the daily records of the hours of operation are required to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the control device. Also, GE has the option to substitute the actual PM calculations with the potential to emit to determine the PM emissions (lb/hr) based on a monthly average during any by-pass of the reclamation unit.
- 4. Visible emission surveys shall not be required when conditions exist that would compromise the safety of the inspector.
- 5. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>

Note:<sup>1</sup> The date for leap years is February 29.

**Emission Unit U111: Emergency Generators****U111 Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	63.6580 through 63.6675

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1 and 4.87
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**U111 Allowable Emissions:**

<b>U111 Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
EP U111a	One (1) Cummins emergency generator, model 1500 DFLE, rated at 2220 bhp.	40CFR63 Subpart ZZZZ <sup>1</sup>	See S1.	N/A	N/A
EP DC#1 & DC#2	Two (2) Kohler Diesel Generator Sets emergency generators, models 2500REOZDB, 24.54 MMBTU/hr	5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 40CFR63 Subpart ZZZZ <sup>1</sup>	See S1.	N/A	N/A

Note:

1. This Administrative Revision has not incorporated the Federal MACT requirements for engines, these requirements will be incorporated in the significant revision or renewal.

**U111 Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. Unit Operation**

The owner or operator shall limit the operation of this unit to five hundred (500) hours in any 12 consecutive month period. (Construction Permit 396-05-C, dated 1/18/2006 and Construction Permit 207-09-C(R1)) (See Comment 6)

**b. HAP**

See Comment 4.

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****a. Unit Operation**

See Specific Condition S3.a.

**b. HAP**

There are no compliance monitoring requirements for HAP. (See Comment 4)

**c. TAC**

See Specific Condition S3.c.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

**a. Unit Operation**

i. The owner or operator shall record, on the first working day after the end of each month, the unit's running time meter reading, and calculate (by difference) and record, the unit's operating time for the previous month, to the nearest tenth of an hour, for compliance with the annual hourly time standard of Specific Condition S1.ai.

ii. Alternatively, the owner or operator shall, when needed, manually record the number of hours the unit was operated that month. For days during the month on which the unit was not operated, a monthly record shall be made of each day that the unit did not run (DNR).

iii. The owner or operator shall calculate and record the monthly and 12 consecutive month total hours of operation of the unit each month.

iv. The owner or operator shall record the amount of fuel combusted in the

unit during a month. The owner or operator may as an alternate; record an estimate of the amount of fuel combusted based on the run time of the unit.

b. **HAP**

There are no compliance record keeping requirements for this equipment. (See Comment 4)

c. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

S4. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 7)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **Unit Operation**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance reports:

- i. The company name.
- ii. The beginning and ending date of the reporting period.
- iii. The calendar month and calendar year operation hours for each month in the reporting period.
- iv. Identification and description of all periods of deviations from the permit requirements.
- v. If no deviations from permit requirements occur during a reporting period, the owner or operator shall submit a negative declaration stating that no permit deviations occurred during the reporting period.

**b. HAP**

There are no routine compliance reporting requirements for this equipment. (See Comment 6)

**c. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

**U111 Comments**

1. The associated internal storage tanks for diesel fuel is exempt from District permitting requirements in accordance with Regulation 2.02, section 2.3.9.2.
2. Potential emissions for this permitted operation are greatest for nitrogen oxides (NO<sub>x</sub>). Based on AP-42 Emission Factors and an operational limit of 500 hours per year, the potential NO<sub>x</sub> emissions for this permitted operation is less than 5 tons per year.
3. This operation is subject to 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, because it involves a stationary reciprocating internal combustion engine (RICE) with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions. (The emergency generator is powered by a stationary RICE with a power rating of 2220 brake horsepower, and GE Consumer and Industrial is a major source of HAP emissions.) This stationary RICE meets the definition in 40 CFR 63.6675 of an emergency stationary RICE, which, per 40 CFR 63.6590(b) (1) (ii), does not have to meet the requirements of 40 CFR Part 63 Subpart ZZZZ and of 40 CFR Part 63 Subpart A except for the initial notification requirements of 40 CFR 63.6645(d)
4. The initial notification required by 40 CFR 63.6645(d), as referenced by 40 CFR 63.6590(b) (1), must be, per 40 CFR 63.6645(c), submitted not later than 120 days after becoming subject to 40 CFR Part 63 Subpart ZZZZ. Pursuant to 40 CFR 63.6645(d), the initial notification should include the information in 40 CFR 63.9(b) (2) (i) through (v); a statement the stationary RICE has no additional requirements; and an explanation of the basis of the exclusion (*i.e.*, operates exclusively as an emergency stationary RICE). The initial notification was received October 25, 2005.
5. The following is a summary of the report periods and due dates for the required reports.



<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1st Semiannual	January 1 through June 30	August 29
2nd Semiannual	July 1 through December 31	March 1 <sup>1</sup>
Note: <sup>1</sup>	The date for leap years is February 29.	

6. Equipment that is operated less than 500 hours per year is considered "Emergency Equipment."
7. Source permit applications were for two (2) 3675 hp, RICE diesel fueled emergency generators, Kohler Diesel Generator Sets, models 2500REOZDB Detroit Diesel (engine models 20V4000G43). Permit limit is based on maximum fuel consumption possible for each unit. Equipment was previously permitted on Construction Permit 207-09-C(R1).
8. This project is subject to the STAR program and has been determined to meet environmental acceptability requirements. Screen 3 modeling of diesel PM PTE emissions yields an estimated risk factor at 445 meters (industrial property) from the proposed generator of  $1.23 \times 10^{-6}$ . This risk rate does not exceed the EA goals of  $10 \times 10^{-6}$  for an individual TAC emitted from new or modified process/process equipment.

Screen 3 modeling of diesel PM PTE emissions yields an estimated risk factor at 680 meters (residential property) from the proposed generator of  $0.97 \times 10^{-6}$ . This risk rate does not exceed the EAG of  $1 \times 10^{-6}$  for an individual TAC emitted from new or modified process/process equipment.

When these risk factor values ( $1.23 \times 10^{-6}$  and  $0.97 \times 10^{-6}$ ) are added to the risk factors ( $1.61 \times 10^{-6}$  and  $1.48 \times 10^{-6}$ ) associated with other new or modified TAC emission units at GE (including the #1 generator), the total plant-wide TAC risk factors for new or modified emission units are  $2.84 \times 10^{-6}$  for off-site industrial property and  $2.45 \times 10^{-6}$  for residential property. These total plant-wide TAC risk factors for new or modified emission units do not exceed the respective EA goals of  $3.8 \times 10^{-6}$  for residential property or  $38 \times 10^{-6}$  for industrial property.

When including the estimated risk factors resulting from the proposed new diesel #2 generator with the estimated total risk factor posed by all other existing and new or modified equipment subject to the STAR requirements, the overall risk factor is estimated to be  $4.43 \times 10^{-6}$  for industrial property and  $3.40 \times 10^{-6}$  for residential property. These risk factors are below the applicable EA goals of  $7.5 \times 10^{-6}$  for residential property and  $75 \times 10^{-6}$  for industrial property.

These total plant-wide TAC risk factors for new or modified emission units are below the EA goals of residential and industrial property.

**Emission Unit: Solvent Metal Cleaning Equipment****Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 through 4

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1 and 4.87
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**Allowable Emissions:**

<b>Solvent Metal Cleaning Equipment Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
Solvent Metal Cleaning Equipment (Secondary Reservoirs)	Thirty (30) cold solvent parts cleaners are equipped with secondary reservoirs.	6.18	See Specific Condition S1.a.	N/A	N/A
Solvent Metal Cleaning Equipment (No Secondary Reservoirs)	Twelve (12) cold solvent parts cleaners are not equipped with secondary reservoirs	6.18	See Specific Condition S1.a.	N/A	N/A

### Specific Conditions

#### S1. Standards (Regulation 2.16, section 4.1.1)

##### a. VOC

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
  - (a) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
  - (b) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
  - (c) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
  - (d) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
  - (e) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
  - (f) If a pump-agitated solvent bath is used, then the agitator shall be operated to produce no more than a rolling motion of solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned. An air-agitated solvent bath shall not be used. (Regulation 6.18, section 4.1.7)
  - (g) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all time the following operating requirements: (Regulation 6.18, section 4.2)

- (a) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
  - (b) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
  - (c) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
  - (d) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
  - (e) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
  - (f) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
  - (g) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

**b. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)**

**a. VOC**

See Specific Condition S3.a.

**b. TAC**

See Specific Condition S3.b.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)****a. VOC**

- i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)
  - (a) The name and address of the solvent supplier,
  - (b) The date of the purchase,
  - (c) The type of the solvent, and
  - (d) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- ii. All records required in Specific Condition S3.a. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

**b. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
  - The signature and title of the responsible official of the company

**a. VOC**

There are no routine compliance reporting requirements for Regulation 6.18.

**b. TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.ii.

**Emission Unit: Combustion Sources less than 10 MMBtu per hour****Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, and 4
7.08	Standards of Performance for New Process Operations	1 through 3

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1 and 4.87
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

<b>Combustion Sources less than 10 MMBtu per hour Emission Points</b>	
<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>
7.06 (Indirect Fired Units)	Opacity < 20%
	PM < 0.069 lb/MMBtu
	SO <sub>2</sub> < 0.87 lb/MMBtu
7.08 (Direct Fired Units)	PM < 2.34 lb/hr
	Opacity < 20%

<b>ID</b>	<b>Description</b>	<b>Control Device</b>	<b>Stack ID</b>
HV 03-01	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 03-02	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 03-03	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 03-04	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-05	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A

ID	Description	Control Device	Stack ID
HV 03-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-07	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-08	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-09	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 03-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-11	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-12	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	N/A	N/A
HV 03-13	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-14	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-15	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 03-16	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-02	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-03	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-04	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-05	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	N/A	N/A
HV 02-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-07	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	N/A	N/A
HV 02-08	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-09	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	N/A	N/A
HV 02-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-11	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 02-12	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 02-13	Make Cambridge, Model S1200 rated at 1.2 MMBtu/hr	N/A	N/A
HV 06-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-01	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-02	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-03	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-04	Make Cambridge, Model S1600 rated at 1.46 MMBtu/hr	N/A	N/A
HV 01-05	Make Cambridge, Model M-136 rated at 5.887 MMBtu/hr	N/A	N/A
HV 01-06	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-07	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 01-08	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 01-09	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-10	Make Cambridge, Model S3200 rated at 3.052 MMBtu/hr	N/A	N/A
HV 01-11	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV 01-12	Make Cambridge, Model S1600 rated at 1.473 MMBtu/hr	N/A	N/A
HV-001	S2200 rated at 2.2 MMBtu/hr (H6+10)	N/A	N/A
HV-002	S2200 rated at 2.2 MMBtu/hr (H14+10)	N/A	N/A
HV-004	M136 rated at 5.887 MMBtu/hr	N/A	N/A
HV-005	S3200 rated at 3.052 MMBtu/hr (H50+10)	N/A	N/A
HV-006	S3200 rated at 3.052 MMBtu/hr (G51-3)	N/A	N/A
HV-007	S3200 rated at 3.052 MMBtu/hr (F51+10)	N/A	N/A
HV-008	S1600 rated at 1.473 MMBtu/hr (Swall DE51)	N/A	N/A



ID	Description	Control Device	Stack ID
HV-009	S3200 rated at 3.052 MMBtu/hr (C51+34)	N/A	N/A
HV-010	S3200 rated at 3.052 MMBtu/hr (Z51-10)	N/A	N/A
HV-011	M136 rated at 5.887 MMBtu/hr (X49-7)	N/A	N/A
HV-012	S3200 rated at 3.052 MMBtu/hr (X31+6)	N/A	N/A
HV-014	S1600 rated at 1.473 MMBtu/hr (A3+3)	N/A	N/A
HV-015	S1200 rated at 1.2 MMBtu/hr located on roof (X43)	N/A	N/A
HV-016	S1200 rated at 1.2 MMBtu/hr located on roof (X38)	N/A	N/A
HV-018	S2200 rated at 2.2 MMBtu/hr (A5/A6)	N/A	N/A
HV-019	S3200 rated at 3.052 MMBtu/hr located on roof (H26+5)	N/A	N/A
AP4 S2200	Rated at 2.2 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
AP4 S3200	Rated at 3.052 MMBtu/hr	N/A	N/A
One (1) natural gas dryoff oven; 7 MM Btu/hr located prior to the application system located in emission unit U01. (Indirect Unit)		N/A	N/A
325	Boiler #1, 5 MMBtu/hr, make Cleaver Brooks, model FLEX500	N/A	4D17
326	Boiler #2, 5 MMBtu/hr, make Cleaver Brooks, model FLEX500	N/A	4D18
AP1BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	N/A	N/A
AP1BM2	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	N/A	N/A
AP1BM3	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-1)	N/A	N/A
AP2BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	N/A	N/A
AP2BM2	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	N/A	N/A
AP2BM3	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-2)	N/A	N/A
AP3BM1	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-3)	N/A	N/A
AP3BM2	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-3)	N/A	N/A
AP3BM3	AERCO 2 MMBtu/hr Natural Gas Fired Hot Water Boiler, model DMK2.0LMGWB (AP-3)	N/A	N/A
AP1HA1	Wash System for Stainless Steel Washer and Dryer Baskets that consists of a heated bath that has a natural gas fired burner for heating. The Immersion Heater is an Eclipse ImmersoPak IP-010 3.2 MMBtu/hr	N/A	N/A
The Cambridge units are direct-fired units.			

**Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. SO<sub>2</sub>**

i. For the indirect fired units, the owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 0.90 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1) (See Comment 1)

ii. For the nine (9) 2 MMBtu/hr Natural Gas Fired Hot Water Boilers and the Immersion Heater:

The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 0.8 pounds per million BTU actual total heat input from combustion of gaseous fuels. (Regulation 7.06, section 5.1.2) (Construction Permit 36340-12-C effective date 12/4/2012) (Construction Permit 33022-11-C effective date 8/17/2011) (See Comment 1)

**b. PM**

i. For indirect fired units, the owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.28 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.4) (See Comment 1)

ii. For the nine (9) 2 MMBtu/hr Natural Gas Fired Hot Water Boilers and the Immersion Heater, the owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.10 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.2) (Construction Permit 36340-12-C effective date 12/4/2012) (Construction Permit 33022-11-C effective date 8/17/2011) (See Comment 1)

iii. For direct fired units, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2) (See Comment 1)

**c. Opacity**

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. (Regulation 7.06, section 4.2 and Regulation 7.08, section 3.1.1) (See Comment 2)

**d. NO<sub>x</sub>**

For direct fired units, the owner or operator shall not allow NO<sub>x</sub> fumes in excess of 300 ppm by volume expressed as NO<sub>2</sub>. (Regulation 7.08, section 4.1) (See Comment 1)

**e. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 3)

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)**

**a. SO<sub>2</sub>**

There are no monitoring requirements for this equipment. (See Comment 1)

**b. PM**

There are no monitoring requirements for this equipment. (See Comment 1)

**c. Opacity**

There are no monitoring requirements for Opacity compliance. (See Comment 2)

**d. NO<sub>x</sub>**

There are no monitoring requirements for this equipment. (See Comment 1)

**e. TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results. (See Comment 3)

ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S3. Record Keeping (Regulation 2.16, section 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. SO<sub>2</sub>**

There are no recordkeeping requirements for this equipment. (See Comment 1)

**b. PM**

There are no recordkeeping requirements for this equipment. (See Comment 1)

**c. Opacity**

There are no recordkeeping requirements for this equipment. (See Comment 2)

**d. NO<sub>x</sub>**

There are no recordkeeping requirements for this equipment. (See Comment 1)

**e. TAC**

There are no record keeping requirements for this equipment. (See Comment 3)

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **SO<sub>2</sub>**

There are no routine compliance reporting requirements for this equipment.

b. **PM**

There are no routine compliance reporting requirements for this equipment.

c. **Opacity**

There are no routine compliance reporting requirements for this equipment.

d. **NO<sub>x</sub>**

There are no routine compliance reporting requirements for this equipment. (See Comment 1)

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

**Comments**

1. The District has performed one-time PM, SO<sub>2</sub>, and NO<sub>x</sub> compliance demonstration for the natural gas fired units combined, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for this equipment with respect to PM, SO<sub>2</sub>, and NO<sub>x</sub> emission limits.
2. The District has determined that burning natural gas will meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
3. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.21, section 2.7)
4. The nine (9) AERCO low NO<sub>x</sub> natural gas fired hot water boilers were previously permitted on construction permit 33022-11-C.
5. The wash system for stainless steel washer and dryer baskets that consists of a heated bath that has a natural gas fired burner for heating (the Eclipse ImmersoPak IP-010 3.2 MMBtu/hr) was previously permitted on construction permit 36340-12-C.

**Emission Unit: Miscellaneous****Applicable Regulations**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 6

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.23	Categories of Toxic Air Contaminants	1 through 6

**Allowable Emissions:**

<b>Miscellaneous Equipment Emission Points</b>					
<b>ID</b>	<b>Description</b>	<b>Applicable Requirement</b>	<b>Allowable Emission/ Equipment Standard</b>	<b>Control Device</b>	<b>Stack ID</b>
32675-11	AP-1 Basket Re-Grinder and AP-1 Tub Re-Grinder 4,000 lb/hr each installed in 1974	6.09	6.52 lb PM/hr	N/A	N/A
		5.00, 5.01, 5.20, 5.21, 5.22, 5.23	See S1.d.		
176-93	Miscellaneous chemical use in assembly/packing operations in the manufacture of refrigerators.	7.25	4.4 tpy (BACT)	N/A	N/A
178-93	Miscellaneous chemical use in assembly/packing operations in the manufacture of dishwashers.	7.25	4.9 tpy (BACT)	N/A	N/A

Miscellaneous Equipment Emission Points					
ID	Description	Applicable Requirement	Allowable Emission/ Equipment Standard	Control Device	Stack ID
483-92	Miscellaneous chemical use in assembly/packing operations for assembly line usage of various adhesives and solvents used on washers and dryers.	6.24	Class II 8 lb/hr 40 lb/day Class III 450 lb/hr 3,000 lb/day Production 70,000 units/week 2,300,000 units/year 29.5 TPY	N/A	N/A
479-94	Sealant to reseal appliance cartons prior to shipment from Building #10	7.25	0.0048 tpy (BACT)	N/A	N/A
35-04	Maintenance Paint Booth (Insignificant Activity)	7.25	4.9 tpy (BACT)	N/A	N/A
583-92	Washer and dryer paint touch-up	7.25	0.55tpy (BACT)	N/A	N/A
471-94	One (1) Dishwasher rack repair station.	7.25	0.67tpy (BACT)	N/A	N/A
585-91	Drawing compound and lubricant use in hydraulic presses and other fabrication operations.	7.25	2.8 tpy (BACT)	N/A	N/A
U149	Pedestal Touch-up Painting on washers/dryers	7.25	See Specific Condition S1.a.i.10)	N/A	N/A
U150	Touch-up Painting on dishwashers	7.25	See Specific Condition S1.a.i.10)	N/A	N/A

**Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****a. VOC**

- i. For equipment subject to Regulation 7.25:
  - (a) The owner or operator shall limit VOC emissions to 4.4 tpy or less for emission point 176-93, miscellaneous chemical use in assembly/packing operations in the manufacture of refrigerators. (Construction Permit # 176-93) (Regulation 7.25, section 3.1)
  - (b) The owner or operator shall limit VOC emissions to 4.9 tpy or less for emission point 178-93, miscellaneous chemical use in assembly/packing operations in the manufacture of dishwashers. (Construction Permit # 178-93) (Regulation 7.25, section 3.1)
  - (c) The owner or operator shall limit VOC emissions to 0.0048 tpy or less for emission point 479-94, sealant to reseal appliance cartons prior to shipment from Building 10. (Construction Permits 479-94) (Regulation 7.25, section 3.1)
  - (d) The owner or operator shall limit VOC emissions to 2.8 tpy or less for emission point 585-91, drawing compound and lubricant use in hydraulic presses and other fabrication operations. (Construction Permit #585-91) (Regulation 7.25, section 3.1)
  - (e) The owner or operator shall limit VOC emissions to 0.55 tpy or less for emission point 583-92, washer and dryer paint touch-up. (Construction Permit #583-92) (Regulation 7.25, section 3.1)
  - (f) The owner or operator shall limit VOC emissions to 0.67 tpy or less for emission point 471-94, one dishwasher rack repair station. (Construction Permit # 471-94)
  - (g) The owner or operator shall limit VOC emissions to 4.9 tpy or less for emission point 35-04, maintenance paint booth. (Construction Permit # 35-04-C/92-05-O)
  - (h) The owner or operator shall not allow or cause the emissions of VOC from equipment subject to Regulation 7.25 plant-wide for emission points that do not have a BACT limit or a banking limit to exceed 5 tons during any consecutive 12-month period and 0.50 tons during any calendar month. (Regulation 7.25, section 5.1)
- ii. For emission point 483-92, miscellaneous chemical use in assembly/packing operations for assembly line usage of various adhesives and solvents used on washers and dryers, subject to Regulation 6.24:
  - (a) Class II Solvents - No owner or operator shall discharge into the atmosphere more than 40 pounds of organic materials in any one day, or more than 8 pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless said



discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.2)

- (b) Class III Solvents - No owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, or more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent is used unless said discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3)
- (c) Maximum permitted capacity is 70,000 units per week, but total annual production may not exceed 2,300,000 units. (Construction Permit 483-92)
- (d) The owner or operator shall limit VOC emissions to 29.5 tpy or less for emission point 483-92. (Construction Permit #483-92)

b. **PM**

For 32675-11, the owner or operator shall not allow PM emissions to exceed 6.25 lb/hr for each of the 4,000 lb/hr Grinders. (Construction Permit #32675-11-C) (Regulation 6.09, section 3.2) (See Comment 1)

c. **Opacity**

For 32675-11, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1) (See Comment 2)

d. **TACs**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. **Monitoring (Regulation 2.16, section 4.1.9.1)**

a. **VOC**

See Specific Condition S3.

b. **PM**

There are no compliance monitoring requirements for this equipment. (See Comment 1)

c. **Opacity**

See Specific Condition S3.c.

d. **TAC**

See Specific Condition S3.d.

S3. **Record Keeping (Regulation 2.16, section 4.1.9.2)**

a. **VOC**

- i. For equipment subject to Regulation 7.25:
  - (a) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 176-93, miscellaneous chemical use in assembly/packing operations in the manufacture of refrigerators.
  - (b) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 178-93, miscellaneous chemical use in assembly/packing operations in the manufacture of dishwashers.
  - (c) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 479-94, sealant to reseal appliance cartons prior to shipment from building #10.
  - (d) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 585-91, drawing compound and lubricant use in hydraulic presses and other fabrication operations.
  - (e) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 583-92, washer and dryer paint touch-up.
  - (f) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 471-94, dishwasher rack repair station.
  - (g) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 35-04, maintenance paint booth.
  - (h) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month combined VOC emissions from emission points U149 and U150, touch-up booths
- ii. For emission point 483-92, miscellaneous chemical use in assembly/packing operations for assembly line usage of various adhesives and solvents used on washers and dryers, subject to Regulation 6.24:
  - (a) The owner or operator shall daily record the hours of operation of the equipment.
  - (b) The owner or operator shall monthly record the raw material usage.
  - (c) The owner or operator shall monthly calculate and record the average hourly and daily VOC emissions for Class II solvents subject to Regulation 6.24.

- (d) The owner or operator shall monthly calculate and record the average hourly and daily VOC emissions for Class III solvents subject to Regulation 6.24.
- (e) The owner or operator shall weekly record the total production (units) for the week.
- (f) The owner or operator shall monthly calculate and record the year to date total production (units).
- (g) The owner or operator shall monthly calculate and record the monthly and twelve consecutive month VOC emissions for emission point 483-92.

**b. PM**

For emission point 32675-11, there are no compliance record keeping requirements for this equipment. (See Comment 1)

**c. Opacity**

- i. For emission point 32675-11, the owner or operator shall perform a monthly visual inspection of the grinder and cyclone unit to check the structural and mechanical integrity of the system for signs of damage, air leakage, corrosion, or other equipment defects and repair as needed.
- ii. The owner or operator shall maintain records, monthly, of the results of all visual inspections. Records of the results of any visual inspection shall include the date of the survey, the name of the person conducting the survey, whether or not damage was observed, and what, if any, corrective action was performed.

**d. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

**S4. Reporting (Regulation 2.16, section. 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See Comment 3)

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during

the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

a. **VOC**

- i. Identification of all periods of exceedances of the VOC limit including the quantity of excess emissions;
- ii. Reason for excess emissions; and
- iii. Description of corrective action taken to prevent future exceedances.
- iv. A negative declaration if there were no exceedances.

b. **PM**

For emission point 32675-11, there are no reporting requirements for this equipment.

c. **Opacity**

- i. Any deviation from the requirement to perform and record the results of each monthly visual inspection; and
- ii. Any deviations from the requirement to record the results of each monthly visual inspection performed; and
- iii. The date of each visual inspection where damage was observed and the corrective action taken.

d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

**Comments**

1. A one-time PM compliance demonstration for this equipment was performed on 5/19/2011 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM emission limits.
2. The visual inspection of the mechanical and structural integrity of the grinder and cyclone unit will ensure the opacity standard is not exceeded
3. The following is a summary of the report periods and due dates for the reports required by this Emission Unit.

<u>Report Description</u>	<u>Report Period</u>	<u>Report Due Dates</u>
1 <sup>st</sup> Semi-annual Report	January 1 through June 30	August 29
2 <sup>nd</sup> Semi-annual Report	July 1 through December 31	March 1 <sup>1</sup>

Notes<sup>1</sup>: The date for leap years is February 29

4. The owner or operator shall be allowed to maintain a one time record of the information and to notify the District if the company decides to make any changes to this information in order to demonstrate compliance with the daily record keeping requirements.

**Permit Shield**

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance per District Regulation 2.16, section 4.6.1.1.

**Off Permit Documents****Document****Date**

One-time compliance demonstration	02, December 2002
One-time compliance demonstration addendum	28, April 2003
One-time compliance demonstration performed by the District	03, April 2007
One-time compliance demonstration performed by the District	23, April 2007
One-time compliance demonstration performed by the District	14, May 2007
One-time compliance demonstration	20, October 2009

**Alternative Operating Scenario**

The company requested no alternative operating scenario in its Title V application.

### Insignificant Activities

The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Insignificant Activities			
Description		Quantity	Basis
Fuel or lubricating oils; VP <10 mm Hg		11	Regulation 2.02, section 2.3.9.2
Fuel oil or diesel tanks; annual turnover < 2 times capacity		6	Regulation 2.02, section 2.3.25
Brazing, soldering, or welding equipment		Various	Regulation 2.02, section 2.3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust		Various	Regulation 2.02, section 2.3.5
Resin curing ovens		Various	Regulation 2.02, section 2.3.7
Plastics compression or injection molding		Various	Regulation 2.02, section 2.3.8
Dipping operations - oils, waxes, or grease		Various	Regulation 2.02, section 2.3.9.1
Emergency relief vents - non- regulated process		Various	Regulation 2.02, section 2.3.10
Lab venting and exhausting		7	Regulation 2.02, section 2.3.11
Vent systems restaurants and bakeries		Various	Regulation 2.02, section 2.3.12
Blast cleaning - abrasives in water		Various	Regulation 2.02, section 2.3.13
Heat treating, soaking or case hardening		Various	Regulation 2.02, section 2.3.14
Residential/domestic equipment		Various	Regulation 2.02, section 2.3.16
Use of peanut, sunflower, canola, or cottonseed oils		1	Regulation 2.02, section 2.3.19
Soil or groundwater remediation		1	Regulation 2.02, section 2.3.20
Maintenance Paint Booth (Previously Permit 35-04) (See Miscellaneous emission unit for standards, monitoring, recordkeeping, and reporting requirements.)		1	Regulation 2.16, section 1.22.1.2.
R & D facilities		7	Regulation 2.02, section 2.3.27
GUH 03-02	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-03	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-04	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-05	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-06	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-07	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-08	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1

<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
GUH 03-09	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-10	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-11	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 03-12	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-23	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-13	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-14	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-15	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-16	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-17	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-18	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-19	Make Sterling, Model QVEF rated at 0.1 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-20	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-21	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-22	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1



<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
EUH 01-23	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-24	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
EUH 01-25	Make Qmark, Model MUH-10-41 rated at 10 kw (0.03 MMBtu/hr)	1	Regulation 2.02, section 2.1.1
GUH 01-26	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-27	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-28	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-29	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-30	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-31	Make Sterling, Model QVEF rated at 0.2 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-32	Make Sterling, Model QVEF rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-33	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-34	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-35	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-36	Make Sterling, Model QVEF rated at 0.25 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-37	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-38	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
GUH 01-39	Make Sterling, Model QVEF rated at 0.4 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-003	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-013	S400 rated at 0.365 MMBtu/hr	1	Regulation 2.02, section 2.1.1
HV-017	S800 rated at 0.73 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-001	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-002	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-003	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-004	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-005	Rated at 0.125 MMBtu/hr	1	Regulation 2.02, section 2.1.1
UH-006	Rated at 0.3 MMBtu/hr located in the paint room (A15)	1	Regulation 2.02, section 2.1.1

<b>Insignificant Activities</b>			
<b>Description</b>		<b>Quantity</b>	<b>Basis</b>
UH-007	Rated at 0.3 MMBtu/hr located in the maintenance shop (A21)	1	Regulation 2.02, section 2.1.1
UH-008	Rated at 0.3 MMBtu/hr located in the maintenance shop (A19)	1	Regulation 2.02, section 2.1.1
UH-009	Rated at 0.3 MMBtu/hr located in the oil room (west wall)	1	Regulation 2.02, section 2.1.1
UH-010	Rated at 0.3 MMBtu/hr located at the dock door (H34)	1	Regulation 2.02, section 2.1.1
UH-011	Rated at 0.3 MMBtu/hr located in the foam room (A6)	1	Regulation 2.02, section 2.1.1
UH-012	Rated at 0.3 MMBtu/hr located at the lab dock (H2)	1	Regulation 2.02, section 2.1.1
UH-013	Rated at 0.3 MMBtu/hr located at the lab dock (H3)	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 75000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 250000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP3 Nylon Heater	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
AP4 150000	Rated at 0.3 MMBtu/hr	1	Regulation 2.02, section 2.1.1
Waste water treatment plant consisting of two (2) clarifiers, two filter presses, and a skimmer.		1	Regulation 2.16, Section 1.22
Cooling towers: AP-1 Front Tower AP-2 Rear Tower AP-2 Front Tower AP-2 Outlying Tower AP-3 North Tower AP-4 South Tower AP-4 Front Tower AP-4 Plastics Tower AP-5 Plastics Tower AP-5 Front Tower AP-20 Tower AP-32 Tower AP-33 Tower		13	Regulation 2.16, Section 1.22
Two Infrared Surface-stabilization Electric Heaters located prior to the application of powder paint. (EP 214A)		1	No applicable regulation.
One dishwasher rack pretreatment tunnel to prepare wire racks for vinyl coating. (Previously Permit 255-96)		1	No applicable regulation.
Washing System (Previously Permit 226-03)		1	No applicable regulation.
MDI Bulk Storage Tank 27,000 Gallons		1	Regulation 2.02 Section 2.3.26
Polyol Bulk Storage Tank 27,000 Gallons		1	Regulation 2.02 Section 2.3.26
Cyclopentane Bulk Storage Tank 12,000 Gallons		1	Regulation 2.02 Section 2.3.26

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Case Mixer Tank 5,600 Gallons	1	Regulation 2.02 Section 2.3.26
Door Mixer Tank 5,600 Gallons	1	Regulation 2.02 Section 2.3.26
Case Poly Blend Hold Tanks 5,300 Gallons	2	Regulation 2.02 Section 2.3.26
Door Poly Blend Hold Tank 5,300 Gallons	1	Regulation 2.02 Section 2.3.26
Polycat Bulk Storage Tank 3,700 Gallons	1	Regulation 2.02 Section 2.3.26
Additive Tanks 250 Gallons	2	Regulation 2.02 Section 2.3.24
Day Tanks < 250 Gallons Each	8	Regulation 2.02 Section 2.3.24
Pedestal Plastic Regrinder	1	Regulation 2.02 Section 2.3.21
Cleaner and Lubricant Use for new Bottom Mount Assembly Operation	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Brazing, Soldering or Welding on HEWH Line	1	Regulation 2.02 Section 2.3.4
Frit Unloading for HEWH Enamel	1	Regulation 2.16, Section 1.23.1.1
Natural Gas Fired Dryer 0.683 MMBtu/hr for HEWH Line	1	Regulation 2.02 Section 2.3.17
Day Tank Storage of MDI 100 Gallons	1	Regulation 2.02 Section 2.3.24/26
Day Tank Storage of Polyol and Blowing Agent 100 Gallons	1	Regulation 2.02 Section 2.3.24/26
Compressor Oil Process Tank 70 Gallons	1	Regulation 2.02 Section 2.3.9.2
Compressor Oil Clean Reservoir Tank 150 Gallons	1	Regulation 2.02 Section 2.3.9.2
Assembly Lubrication for new HEWH Line	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Laser Cutting	1	Regulation 2.16, Section 1.23.1.1
Brazing, Soldering or Welding on Nylon Wire Rack Line	1	Regulation 2.02 Section 2.3.4
Nylon powder transfer/clean-up activities	1	Regulation 2.16, Section 1.23.1.1
Dishwasher Door Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Tub Top and Bottom Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Tub Wrap Mastic Application	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Stainless Steel Tub Assembly	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Pad Printing	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Water Heater Tank Top Cleaning	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
Small Freezer Door Foaming Operation	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
AP1 RTV Silicone Station	1	Regulation 2.16, Section 1.23.1.1 (Regulation 7.25 is still applicable and this unit will be tracked for plant-wide VOC limit)
AP1 Make Up Air Heater, Maxon 2.0 APX Line Burner, 2.0 MMBTU/Hr	1	Per APCD Email dated 12/14/12 regarding Comfort/Space heating under 10MMBTU/Hr
Bradford White 1.99 mmbtu/hr hot water heater in the Park Athletic Club	1	Regulation 2.02, section 2.1.1
Internal Storage Tanks for Diesel Fuel	1	Regulation 2.02, section 2.3.9.2
Pellet Grinder and process cyclone make Granutee G3030	1	Regulation 2.16, Section 1.23.1.1
Grinding operation for the AP-3 Ash White Tub Re-grinder	1	Regulation 2.16, Section 1.23.1.1
Unloading, Conveyance and Storage of Plastic Pellets in AP5	1	Regulation 2.16, Section 1.23.1.1
Small Regrinders in AP5 used to recycle plastic	1	Regulation 2.16, Section 1.23.1.1

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified in Regulation 2.02, section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
1. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
  2. No visible emission surveys or other monitoring shall be required for facilities designated as insignificant activities.
- C. In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the Pollutant Potential To Emit quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions
- D. The Insignificant Activities table is correct as of the date of the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.
- E. Trivial Activities are only those activities or processes falling into the general categories defined in Regulation 2.16, section 1.41, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
1. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
  2. Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.
  3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
  4. Non-commercial food preparation.
  5. Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction. **Note:** Printing labels for the purpose of distribution from office equipment is considered consumer use.
  6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet vent emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification.<sup>1</sup>
14. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
15. Portable electrical generators that can be moved by hand from one location to another<sup>2</sup>.
16. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
17. Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.
18. Air compressors and pneumatically operated equipment, including hand tools.
19. Batteries and battery charging stations, except at battery manufacturing plants.
20. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.<sup>4</sup>
21. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
22. Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
23. Drop hammers or hydraulic presses for forging or metalworking.
24. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
25. Vents from continuous emissions monitors and other analyzers.
26. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
27. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
28. Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.
29. CO<sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.
30. Consumer use of paper trimmers/binders.

31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant (HAP) gasses.
39. Shock chambers.
40. Humidity chambers.
41. Solar simulators.
42. Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
43. Process water filtration systems and demineralizes.
44. Demineralized water tanks and demineralizer vents.
45. Boiler water treatment operations, not including cooling towers.
46. Oxygen scavenging (de-aeration) of water.
47. Ozone generators.
48. Fire suppression systems.
49. Emergency road flares.
50. Steam vents and safety relief valves.
51. Steam leaks.
52. Steam cleaning operations.
53. Steam sterilizers.

## Appendix A

### NO<sub>x</sub> RACT Plan - Amendment 1

1. The oxides of nitrogen (NO<sub>x</sub>, expressed as NO<sub>2</sub>) emission from each of Boiler #6 and Boiler #7 shall not exceed 0.20 pound per million Btu of heat input.
2. If either of Boiler #6 or Boiler #7 has a seasonal capacity factor greater than 15.0%, then GE Appliances shall, prior to operating that boiler during any subsequent ozone control season, conduct a performance test for NO<sub>x</sub> for that boiler in conformance with the requirements of NO<sub>x</sub> RACT Plan Element (Element) No. 5. GE Appliances shall conduct a performance test for NO<sub>x</sub> for Boiler #6 in conformance with the requirements of Element No. 5 prior to May 1, 2001.
3. As used in this NO<sub>x</sub> RACT Plan, the term “seasonal capacity factor” means the ratio between the actual heat input to a boiler from fuel combusted during the period May 1 through September 30 (ozone control season) and the potential heat input to the boiler had it been operated for 24 hours per day for each day during the ozone control season at the maximum steady state design heat input capacity. The maximum heat input capacity provided by the manufacturer shall be used unless GE Appliances determines the maximum heat input capacity using the heat loss method described in sections 5 and 7.3 of the ASME *Power Test Codes* 4.1.
4. If a boiler is required to conduct a performance test in two consecutive years and if the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstitution provision, then subsequent performance testing may be done on a biennial schedule.
5. Performance testing shall meet the following requirements:
  - A. Emissions concentrations and the mass determinations shall be obtained using Reference Methods of 40 CFR Part 60 Appendix A. The following methods shall be used:
    - (1) Method 1 or 1A, which furnishes guidance in site and traverse selection for sampling velocity at traverse points in stationary sources,
    - (2) Method 2, 2A, 2B, 2C, 2D, 2E, 2F, 2G, or 2H, which applies to measurements of gas volumetric flow rates,
    - (3) Method 3, 3A, 3B, or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide, O<sub>2</sub>, CO, nitrogen, and methane,
    - (4) Method 4, which determines the moisture content in stack gases, and
    - (5) Method 7, 7A, 7B, 7C, 7D, or 7E, which provides the analytical method for determining the concentration of NO<sub>x</sub> emissions from stationary sources.
  - B. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests, or modifications to the Reference Methods listed in Element No. 5.A. may be proposed by GE Appliances as part of the testing plan



- required by Element No. 5.D. Such methods may be used if approved in writing by the District.
- C. Performance testing shall meet the requirements of Regulation 1.04 Performance Tests that are not addressed in this Element.
  - D. A notification of intent to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used. A Protocol Checklist is listed in Appendix C which contains the information to be submitted in the protocol.
  - E. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
  - F. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
  - G. A performance test report shall be submitted to the District within 60 days of completion of performance testing. The report shall include the calculations used to determine emissions. The NO<sub>x</sub> emission rate shall be expressed in both pounds per hour and pounds per million Btu formats. The raw data shall be retained by GE Appliances for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
- 6. Each boiler of the group Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5 shall comply with one of the following options:
    - A. Option 1: The boiler shall not have a seasonal capacity factor greater than 10.0%.
    - B. Option 2: The NO<sub>x</sub> (expressed as NO<sub>2</sub>) emission from the boiler shall not exceed 0.70 pound per million Btu of heat input.
  - 7. GE Appliances shall, before March 1, 2001, notify the District in writing as to which option will be applicable to each of Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5 starting March 1, 2001. If GE Appliances decides to switch from the initial option for a boiler, then GE Appliances shall notify the District in writing, before the date of implementing the other option, of its decision to switch to that option for that boiler.
  - 8. If any boiler of the group Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5 has a seasonal capacity factor greater than 10.0%, then GE Appliances shall, prior to operating that boiler during any subsequent ozone control season, conduct a performance test for NO<sub>x</sub> for that boiler in conformance with the requirements of Element No. 5. If a performance test is required for a boiler in two consecutive years and if the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstitution provision, then subsequent performance testing may be done on a biennial schedule.
  - 9. GE Appliances shall make a record of the type, heat content, and amount of fuel combusted during each day of operation during the ozone control season of each boiler included in this NO<sub>x</sub> RACT Plan. GE Appliances shall, at the end of each month during

the ozone control season, calculate and record for each boiler its seasonal capacity factor. Each record shall be maintained for a minimum of 5 years and made available to the District upon request.

10. GE Appliances shall, within 12 months prior to the beginning of the ozone control season or prior to operating Boiler #6 during the ozone control season, perform and undertake corrections as necessary, and make a record of the following boiler maintenance activities:
  - A. Inspect, and either tighten or replace, the seals in the air passage to eliminate visible gaps,
  - B. Inspect burner ring,
  - C. Inspect refractory, remove any residue present, and make repairs necessary to create a smooth wall surface,
  - D. Inspect and blow sensing lines on the LFG pressure regulator, and
  - E. Inspect and check BMS electronic combustion control circuit board and terminal connections.
11. If all of the boilers of the group Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5 are operating under Option 1 of Element No. 6, then GE Appliances shall, before May 1 of each year, notify the District in writing as to which boiler of this group will be the designated primary backup boiler for that year's ozone control season. Additionally, GE Appliances shall, within 12 months prior to the beginning of the ozone control season or prior to operating the designated backup boiler during the ozone control season, perform and undertake corrections as necessary, and make a record of the following boiler maintenance activities on the designated primary backup boiler:
  - A. Rebuilding the stoker mechanism,
  - B. Inspecting and either tightening or replacing the seals in the air passage to eliminate visible gaps,
  - C. Punching out all blocked grate holes,
  - D. Inspecting and repairing grate dampers as needed to make them fully functional,
  - E. Inspecting interior wall refractory and removing slag or making repairs necessary to create a smooth wall surface, or both,
  - F. Removing slag from over-fire air nozzles,
  - G. Replacing any clogged over-fire air nozzles,
  - H. Inspecting and cleaning or repairing electronic combustion controls as needed to make them operational,
  - I. Cleaning heavy ash from louvers, induced draft fans, and forced air fans, and
  - J. Setting-up and balancing the rebuilt stoker mechanism to maximize boiler efficiency.
12. GE Appliances shall keep a record identifying all deviations from the requirements of this NO<sub>x</sub> RACT Plan and shall submit to the District a written report of all deviations that

occurred during the preceding semi-annual period. Semi-annual periods shall run from January 1 to June 30 and July 1 to December 31. The report shall contain the following information:

- A. The boiler number,
- B. The beginning and ending date of the reporting period,
- C. Identification of all periods during which a deviation occurred,
- D. A description, including the magnitude, of the deviation,
- E. If known, the cause of the deviation, and
- F. A description of all corrective actions taken to abate the deviation.

If no deviation occurred during the semi-annual period, the report shall contain a negative declaration. Each report shall be submitted within 60 days following the end of the semi-annual period.

- 13. GE Appliances shall include in each report pursuant to Element No. 12 a summary of the boiler maintenance activities required by Elements No. 10 and 11 that occurred during the preceding semi-annual period.
- 14. GE Appliances shall, before May 1, 2001, submit to the District a written description of daily activities and procedures that may be conducted by the boiler operators to ensure proper operation of the boilers used during the ozone control season.
- 15. In lieu of the requirements in this NO<sub>x</sub> RACT Plan, GE Appliances may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring, record keeping, or reporting, provided the following conditions are met:
  - A. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16,
  - B. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in section II.A. of White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative requirements shall consider the effect on an intrinsic basis, such as pounds per million Btu,
  - C. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal, or revision of the Title V Operating Permit, and either
  - D. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit, or
  - E. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to EPA no later than 5 working days after the end of the public comment period.

The District's determination of approval of any alternative requirements is not binding on EPA. Noncompliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of this NO<sub>x</sub> RACT Plan.

History: Approved 11-8-99; effective 1-1-00; amended a1/1-17-01 effective 3-1-01.

**Comment**

The company conducted a performance test for NO<sub>x</sub> for Boiler #6 on February 18, 2004, March 23, 2006, and April 3, 2008.

**Appendix B****40 CFR 63 Subpart NNNN (MACT) Specific Conditions****S1. Standards (Regulation 2.16, section 4.1.1)****HAP**

The owner or operator shall limit organic HAP emissions to the atmosphere to no more than 0.13 kilogram per liter (kg/liter) (1.1 pound per gallon (lb/gal)) of coating solids used during each compliance period. (40 CFR 63.4090(a.))

**S2. Monitoring (Regulation 2.16, section 4.1.9.1)****HAP**

- a. The owner or operator shall monthly determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the month using one of the following methods: (40 CFR 63.4152(a) & 40 CFR 63.4151(a))

- i. Method 311 (appendix A to 40 CFR part 63)

The owner or operator may use a Method 311 for determining the mass fraction of organic HAP using the following procedures: (40 CFR 63.4141(a) (1))

- (a) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d) (4) and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (for example, 0.3791). (40 CFR 63.4141(a) (1) (i))
- (b) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (for example, 0.763). (40 CFR 63.4141(a) (1) (ii))

- ii. Method 24 (appendix A to 40 CFR part 60)

For coatings, the owner or operator may use Method 24 to determine the mass fraction of non-aqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. (40 CFR 63.4141(a) (2))

- iii. Alternative method

The owner or operator may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. (40 CFR 63.4141(a) (3))

iv. Information from the supplier or manufacturer of the material

The owner or operator may rely on information other than that generated by the test methods specified in Specific Conditions S2.a.i through S2.a.iii, such as manufacturer's formulation data if they represent each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d) (4) and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. If there is a disagreement between such information and results of a test conducted according to Specific Conditions S2.a.i through S2.a.iii, then the test method results will take precedence. (40 CFR 63.4141(a) (4))

v. Solvent blends

Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries, and you may only use Table 4 if the solvent blends in the materials you use do not match any of the solvent blends in Table 3, and you only know whether the blend is aliphatic or aromatic. However, if the results of a Method 311 test indicate higher values than those listed on Table 3 or 4 of 40 CFR 63 Subpart NNNN, the Method 311 results will take precedence. (40 CFR 63.4141(a) (5))

b. The owner or operator must determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation on one of the following: (40 CFR 63.4141(b))

i. ASTM Method D2697-86 (Reapproved 1998) or D6093-97

The owner or operator may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings," or D6093-97, "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (see 40 CFR 63.14) to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. (40 CFR 63.4141(b) (1))

ii. Information from the supplier or manufacturer of the material.

The owner or operator may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. (40 CFR 63.4141(b) (2))

iii. Calculation of volume fraction of coating solids.

If the volume fraction of coating solids cannot be determined using the options in Specific Conditions S2.b.i or S2.b.ii., the owner or operator must determine the volume fraction of coating solids using Equation 1 of 40 CFR 63.4141(b) (3):

$$V_s = \left[ \frac{m_{volatiles}}{D_{avg}} \right] \text{ (Equation 1, 40 CFR 63.414(b) (3))}$$

Where:

$V_s$  = volume fraction of coating solids, liters coating solids per liter coating.

$m_{volatiles}$  = total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{avg}$  = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (40 CFR 63.14) information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence. (40 CFR 63.4141(b) (3))

- c. Determine the density of each coating used during the month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (40 CFR 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence. (40 CFR 63.4141(c))
- d. Determine the organic HAP content, kg organic HAP per liter coating solids, of each coating used during the compliance period, using Equation 2 of 40 CFR 63.4141(d), except that if the mass fraction of organic HAP equals zero, then the organic HAP content also equals zero and you are not required to use Equation 2 to calculate the organic HAP content: (40 CFR 63.4141(d))

$$H_c = (D_c)(W_c) / V_s \text{ (Equation 2, 40 CFR 63.414(d))}$$

Where:

$H_c$  = organic HAP content of the coating, kg organic HAP per liter coating solids.

$D_c$  = density of coating, kg coating per liter coating, determined according to Specific Condition S2.d. of this section.

$W_c$  = mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to Specific Condition S2.a.

$V_s$  = volume fraction of coating solids, liters coating solids per liter coating, determined according to Specific Condition S2.b.

### S3. Record Keeping (Regulation 2.16, section 4.1.9.2)

#### HAP

- a. A copy of each notification and report that you submitted to comply with 40 CFR 63 Subpart NNNN and the documentation supporting each notification and report. (40 CFR 63.4130(a))
- b. A current copy of information provided by materials suppliers or manufacturers such as manufacturer's formulation data or test caused to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. (40 CFR 63.4130(b))
- c. For each month, a record of the time periods (beginning and ending dates and times) and the coating operations at which each compliance option (compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option) was used and a record of all determinations of kg organic HAP per liter of coating solids for the compliance option(s) you used as specified below: (40 CFR 63.4130(c))
  - i. For the compliant material option:
 

A monthly record of the determination of the organic HAP content for each coating according to Specific Condition S2.d. (40 CFR 63.4130(c) (1))
  - ii. For the emission rate without add-on controls option:
 

A monthly record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1 and 1A through 1C of 40 CFR 63.4151 and, if applicable, the calculations used to determine the mass of organic HAP in waste materials according to 40 CFR 63.4151(e) (4); the calculation of the total volume of coating solids used each month, using Equation 2 of 63.4151; and the calculation of the organic HAP emission rate, using Equation 3 of 63.4151. (40 CFR 63.413(c) (2))

    - (a) (Calculate the mass of organic HAP emission during the month: (40 CFR 63.4151(e)):
$$H_e = A + B + C - R_w \quad (\text{Equation 1, 40 CFR 63.4151})$$



Where:

$H_e$  = total mass of organic HAP emissions during the compliance period, kg.

$A$  = total mass of organic HAP in the coatings used during the compliance period, kg, as calculated in Equation 1A of this section.

$B$  = total mass of organic HAP in the thinners used during the compliance period, kg, as calculated in Equation 1B.

$C$  = total mass of organic HAP in the cleaning materials used during the compliance period, kg, as calculated in Equation 1C.

$R_w$  = total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, kg, determined according to 40 CFR 63.4151(e) (4). (You may assign a value of zero to  $R_w$  if you do not wish to use this allowance.)

- (b) (Calculate the kg organic HAP in the coatings used during the month (40 CFR 63.4151(e) (1)):

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i})$$

(Equation 1A, 40 CFR 63.4151)

Where:

$A$  = total mass of organic HAP in the coatings used during the compliance period, kg.

$Vol_{c,i}$  = total volume of coating,  $i$ , used during the compliance period, liters.

$D_{c,i}$  = density of coating,  $i$ , kg coating per liter coating

$W_{c,i}$  = mass fraction or organic HAP in coating,  $i$ , kg organic HAP per kg coating.

$m$  = number of different coatings used during the compliance period.

- (c) (Calculate the kg or organic HAP in the thinners used during the month (40 CFR 63.4151(e) (2)):

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j})$$

(Equation 1B, 40 CFR 63.4151)

Where:

$B$  = total mass of organic HAP in the thinners used during the compliance period, kg.

$Vol_{t,j}$  = total volume of thinner,  $j$ , used during the compliance period, liters.

$D_{t,j}$  = density of thinner,  $j$ , kg thinner per liter thinner.

$W_{t,j}$  = mass fraction of organic HAP in thinner,  $j$ , kg organic HAP per kg thinner.

$n$  = number of different thinners used during the compliance period.

- (d) (Calculate the kg organic HAP in the cleaning materials used during the month (40 CFR 63.4151(e) (3)):

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad \text{(Equation 1C, 40 CFR 63.4151)}$$

Where:

$C$  = total mass of organic HAP in the cleaning materials used during the compliance period, kg.

$Vol_{s,k}$  = total volume of cleaning material,  $k$ , used during the compliance period, liters.

$D_{s,k}$  = density of cleaning material,  $k$ , kg cleaning material per liter cleaning material.

$W_{s,k}$  = mass fraction of organic HAP in cleaning material,  $k$ , kg organic HAP per kg material.

$p$  = number of different cleaning materials used during the compliance period.

- (e) (Calculate the total volume of coating solids used during the month (40 CFR 63.4151(f)):

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad \text{(Equation 2, 40 CFR 63.4151)}$$

Where:

$V_{st}$  = total volume of coating solids used during the month, liters

$Vol_{c,i}$  = total volume of coating,  $i$ , used during the compliance period, liters.

$V_{s,i}$  = volume fraction of coating solids for coating, i, liters solids per liter coating, determined according to one of the following: (40 CFR 63.4141(b))

- (f) (ASTM Method D2697-86 (Reapproved 1998) or D6093-97. You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings," or D6093-97, "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. (40 CFR 63.4141(b) (1))
- (g) (Information from the supplier or manufacturer of the material. You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. (40 CFR 63.4141(b) (2))
- (h) Calculation of volume fraction of coating solids.

If the volume fraction of coating solids cannot be determined using the options in Specific Condition S3.c.ii.(5) (a) or (b), then you must determine using Equation 1 of 40 CFR 63.4141: (40 CFR 63.4141(b) (3))

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \quad (\text{Equation 1, 40 CFR 63.4141})$$

Where:

$V_s$  = volume fraction of coating solids, liters coating solids per liter coating.

$m_{volatiles}$  = total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{avg}$  = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence.

- d. A monthly record of the name and volume of each coating, thinner, and cleaning material used during the month. (40 CFR 63.4130(d))
- e. A monthly record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month. (40 CFR 63.4130(e))
- f. A monthly record of the volume fraction of coating solids for each coating used during each month except for zero-HAP coatings for which volume solids determination is not required as allowed in 40 CFR 63.4141(a). (40 CFR 63.4130(f))
- g. A monthly record of the density for each coating used during each compliance period except for zero-HAP coatings for which volume solids determination is not required as allowed in 63.4141(a) and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, a record of the density for each thinner and cleaning material used during each compliance period. (40 CFR 63.4130(g))
- h. The owner or operator shall maintain records of the date, time, and duration of each deviation. (40 CFR 63.4130(j))

**S4. Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

*Responsible Official Certification*

All semi-annual compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. If a change in the "Responsible Official" occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days following the date a change in the designated Responsible Official occurs for this facility.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- The signature and title of the responsible official of the company

**HAP**

The semiannual compliance report must contain the information specified as below: (40 CFR 63.4120(b))

- a. Company name and address. (40 CFR 63.4120(b) (1))
- b. Statement by a responsible official with that official's name, title, and signature certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.4120(b) (2))
- c. Date of report and beginning and ending dates or the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. (40 CFR 63.4120(b) (3))

- d. Identification of the compliance option or options specified in 63.4091 (compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option) that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option. (40 CFR 63.4120(b) (4))
- e. If there were no deviations from the emission limit in Specific Condition S1, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. (40 CFR 63.4120(c))
- f. For the compliant material option:
  - i. If you used the compliant material option and there was a deviation from the applicable emission limit in Specific Condition S1, the semiannual compliance report must contain the following: (40 CFR 63.4120(d))
  - ii. Identification of each coating used that deviated from the emission limit, each thinner and cleaning material used that contained organic HAP, and the dates and time periods each was used. (40 CFR 63.4120(d) (1))
  - iii. The determination of the organic HAP content, according to 63.4141(d), for each coating identified in Specific Condition S4.f.i. You do not need to submit background data supporting this calculation, for example, information provided by coating suppliers or manufacturers or test reports. (40 CFR 63.4120(d) (2))
  - iv. The determination of the organic HAP for each thinner and cleaning material identified in Specific Condition S4.f.i. You do not need to submit background data supporting this calculation, for example, information provided by material suppliers or manufactures or test reports. (40 CFR 63.4120(d) (3))
  - v. A statement of the cause of each deviation. (40 CFR 63.4120(d) (4))
- g. For the emission rate without add-on controls option:

If you use the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 63.4090, the semiannual compliance report must contain the following information: (40 CFR 63.4120(e))

  - i. The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the emission limit in Specific Condition S1. (40 CFR 63.4120(e) (1))
  - ii. The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in 63.4151; (see Specific Condition S3.c.ii) and, if applicable, the calculation used to determine the organic HAP in waste materials according to 63.4151(e) (4). You do not need to submit background data supporting these calculations, for example, information provided by materials suppliers or manufactures

or test reports. (40 CFR 63.4120(e) (2))

iii. A statement of the cause of each deviation. (40 CFR 63.4120(e) (3))

**Comments**

1. The Initial Notification required by 40 CFR 63.4110(a)(1) was submitted on July 23, 2003.
2. The Notification of Compliance Status was submitted on Sep. 30, 2005.
3. The reports required by 40 CFR 63 Subpart NNNN are to be postmarked or delivered by July 31 or January 31, whichever is the first date following the end of the report period.

**Appendix C - Protocol Checklist for Performance Test**

A completed protocol should include the following information:

- ☐ 1. Facility name, location, and ID #;
- ☐ 2. Responsible Official and environmental contact names;
- ☐ 3. Permit numbers which are requiring the test to be conducted;
- ☐ 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- ☐ 5. Alternative test methods or description of modifications to the test methods to be used;
- ☐ 6. Purpose of the test including equipment, and pollutant to be tested; the purpose may be described in the permit which requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- ☐ 7. Tentative test dates (these may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation);
- ☐ 8. Maximum rated production capacity of the system;
- ☐ 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate based on limits);
- ☐ 10. Method to be used for determining rate of production during the performance test;
- ☐ 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- ☐ 12. Description of normal operation cycles;
- ☐ 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- ☐ 14. Process flow diagram;
- ☐ 15. List the type and manufacturer of the control equipment if any;
- ☐ 16. List the control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test; note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- ☐ 17. How quality assurance and accuracy of the data will be maintained, including;
  - ☐ Sample identification and chain-of-custody procedures;
  - ☐ Are audit samples required for this test Method (EPA contact number for audit samples 919-541-1062) if yes then please make samples available to the District for observation during the stack test;
  - ☐ Audit sample provider;
  - ☐ Number of audit samples to be used;
- ☐ 18. Pipe, duct, stack, or flue diameter to be tested;
- ☐ 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- ☐ 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
  - ☐ Method 1 if stack is >12"
  - ☐ Method 1a if stack is between 4" and 12"
  - ☐ Alternate method of determination for <4"
  - ☐ If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability

of a measurement location. This procedure described in Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.

- ☐ 21. The Stack Test Review fee of \$500.00 shall be submitted with each stack test protocol.

**End of Document**